

** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. - 8 p.m.

Thursday, February 13, 2003

Rohm & Haas Plant, Second Floor Conference Room 2000 West Street (Dinner will be provided)

Topic:
Relocation of Air Toxics Monitor in the Reading Area and
Citizen Odor Sampling Program

Presented by:
Kerri Castlen
Permits & Enforcement Area Supervisor
Hamilton County Dept. of Environmental Services

Please let me know by Tuesday, February 11, whether or not you will be attending the meeting. The plant remains under heightened security and I am required to leave the names of meeting attendees with the guard. Members who show up for the meeting without notice are likely to be turned away.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany.dale@etc-online.com



AGENDA January 9, 2003 6:00 p.m. — 8:00 p.m.

Sign-In
Introductions
Dinner
Plant Update
Community Issues Update
Announcements
2002 Evaluation Summary
2003 Agenda Setting

All All

Bruce Beiser Neighbors

All

Bethany Dale Bethany Dale



January 9, 2003 Meeting Minutes

Members Present

Suzie Bateman
Bruce Beiser
Rachael Belz
Carol Bullock-Carpenter
Cheyenne Gill
Jon Hopkins
Chief Kevin Kaiser
Curt Lambert
Dave Lehrter
Margie Lehrter
Jim Pfennig
Barb Stall
Margie Stall
Nancy Stall
Linda Stichtenoth

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and reviewed the agenda. Dinner followed.

Plant Update — November & December (Bruce Beiser) Safety

• The plant had 3 OSHA recordable injuries in 2002. The third occurred in November, when a mechanic experienced a repetitive motion injury to his elbow. He was put on work restriction. The plant had five OSHA recordable injuries in 2001.

Environment

Sewer

• At the last CAC meeting in October, Bruce said the plant had experienced six wastewater permit exceedances for chloroform. Since then, the source of the chloroform has been confirmed to be the scrubber used for odor control. The plant has stopped discharging the scrubber's wastewater to the sewer. The plant is now collecting the wastewater and sending it offsite as a waste until they can determine how to solve the problem.

Q: How far over the permit level were the six chloroform exceedances?

- A: The permit limit is 20 parts per million (ppm) and we were slightly over that. The plant had four days of sampling when chloroform was detected above the permitted daily limit. Then at the end of the month, those four days of sampling were averaged and we were over our monthly permitted level as well. So there are multiple permit exceedances for the same events.
- The plant had a low pH violation in the south sewer. The cause has not been identified but it could be from lab or janitorial activities.
- Q: Did the Metropolitan Sewer District discover the pH violation?
- A: No, it was self-reported by the plant.

Air

- On December 10, the plant had an accidental release of 500 lbs of methyl chloride. The release was reported to the Ohio and US EPA. The release was caused by a start-up problem with the methyl chloride recovery system. The cooling water that is supposed to condense the methyl chloride was not flowing, so the methyl chloride vapors were being vented to the air instead of being recovered. The cause was a blocked valve. This might be considered an equipment malfunction, but the conservatively called it an accidental release. The reportable quantity of methyl chloride is 100 lbs.
- There were no air permit violations or exceedances to report.
- Q: Did the plant's alarm go off when the methyl chloride was released?
- A: No, the amount released did not trigger the environmental alarms. Curt modeled the maximum amount of methyl chloride to be about 8 ppm at the worst location along the fence line. OSHA's threshold limit value is 100 ppm (8-hour time weighted average).
- Q: Will the methyl chloride release trigger a Notice of Violation?
- A: Probably, although we did not violate our permit. We may receive a nuisance violation.
- At the October CAC meeting, Bruce said the plant had a small leak of chlorine, but he did not know the amount that was released. The amount of chlorine that leaked was determined to be 0.2 lb.

RCRA Site Investigation

• A report summarizing the testing of the plant's groundwater recovery system is due this month. Preliminary data shows the groundwater recovery system is adequate if operated correctly.

Odor Reduction

- There have been no odor complaints since the last CAC meeting in October.
- The plant's new ester process has been implemented and process optimization is still going on.
- The plant had reduced production activity through November and December.
- Plant engineers, corporate engineers and Jacobs Engineering are evaluating the odor control system designs.

Odor Control Systems Update (Curt Lambert)

Indoor Odor Reduction Efforts

1. Ester process

a. Changes to this process were implemented this summer. The process engineering department continues to optimize the process.

b. One of the goals is to optimize a particular process step (the extraction step) to

minimize the amount of a particular compound in the wastewater.

c. Eventually the process engineering department will reach a point where it is not feasible to reduce the amount of the particular compound in the wastewater any further.

d. Whether that "technical limit" has already been reached is unknown, but the process engineering department's optimizing successes since last summer will make future successes more challenging.

2. Ventilation

- a. General building ventilation The air inside the building should be "turned over" 6 times every hour. This equates to about 450,000 cubic feet per minute of air flow.
- b. Spot ventilation 10-15 "work stations" in the building have been targeted to be spot ventilated. A spot vent would be similar to an overhead vacuum that would collect odors from that individual location only. Examples of possible spot ventilation locations may include manways (lids on top of the reactor vessels) and PL filter boxes. The design work on the spot ventilation is making progress. Jacobs Engineering has submitted a "hood" design to ventilate the PL filter boxes; the plant's ventilation team believes it to be a workable design. Jacobs Engineering has not submitted a "hood" design to ventilate the manways.

c. Source ventilation — This is a new concept that the plant hadn't considered previously, but that may have some benefit. It may include building a higher stack

for venting air from inside some parts of the buildings to the outside.

d. All three ventilation measures (a through c) need to be modeled together to see how making changes to one would impact the others. [Post-Meeting Note: Both plant personnel and corporate personnel are conducting separate and independent modeling analyses to ensure the reliability of the modeling results.]

e. All three projects should be fully operational by fall 2003.

f. The estimated cost for all of these odor control projects is \$350,000 - \$500,000.

Outdoor Odor Reduction Efforts

- 1. Sewers The plant needs to characterize the sewer water composition and look at mitigation options.
- 2. Past improvements have included covering manholes, using biofilters, and optimizing vent line heights and locations. Some of these improvements have had positive impacts on fence line odors, while others have not. A new "waste digesting bacterial system" may be reviewed as a viable option to reduce odors.
- Q: Do other Rohm and Haas sites have similar odor problems? If so, have any of these reductions techniques worked?
- A: No, we are the only R&H site that makes these products.

Methyl Chloride Emission Reduction

The mass balance study was completed and it verified the previous study done in July. Much
of the data collected by the IT Corp. was incomplete and inaccurate and has cost the plant time

and money. The plant is now considering a whole new design system. The cryogenic chiller, by itself, is no longer an option. Corporate engineering is looking at the various options and is expected to have their selection made by the end of the month. The emission reduction equipment is expected to cost around \$1 million.

Community Relations

- Bruce told the CAC that he has agreed to participate on Reading High School's Strategic Action Team. The team will establish planning goals for continuous improvement and evaluate new and existing school programs.
- The plant raised \$38,600 during its 2002 United Way campaign drive. 78 employees participated.
- Employees provided Christmas toys and clothing for 55 Lockland Head Start children.

Early Truck Arrivals

- Bruce reported that 19 trucks have arrived early since the last meeting (10 weeks ago).
- 10 arrived before 6:30 a.m.
- The plant still addresses each early arrival. Recently, many of the trucks are customer trucks and the plant has to communicate with them very carefully. In the past the early arrivals have been supplier trucks, which the plant has aggressively communicated with about arrival times.
- Progress in this area has leveled off and another initiative is needed for continuous improvement.
- Q: Were any of the early trucks supplier trucks?
- A: Maybe 1/3 of the early arrivals were supplier trucks.

Site News

- The plant reduced its workforce by 10% this week within support functions. This was due to global business conditions, rising raw material and energy costs, and increased costs for business insurance and health care.
- Plant employees have been coping with the unexpected death of a coworker.
- The plant is dealing with morale issues and is trying to keep employees focused on their jobs and on safety.
- Q: How many people were affected by the workforce reduction?
- A: Eight full-time employees. The plant didn't fill open positions, and positions filled by temporaries were eliminated.
- Q: Did any other R&H sites have job cuts?
- A: This was specific to our site, but some other sites went through restructuring.

Community Update

• Nancy Stall said she could smell the diesel trucks running in the morning.

CAC Evaluation (Bethany Dale)

Please refer to the attached 2002 Evaluation Summary and Tally of 2002 Evaluation Results for a summary of this presentation.

Comments:

- Bruce said he is pleased with the results considering the CAC is less than 2 years old. He appreciates all of the members' commitment to the group.
- Linda was encouraged by the members' willingness and commitment to remain on the CAC in 2003.
- Bethany asked the CAC for its permission to share and publish the results of the evaluation. Linda added that Rohm and Haas is looking forward to using it as a template for all of their CACs. The CAC agreed that sharing the evaluation and results would be a good idea.
- Bruce said he would like to talk to the CAC about site security and truck access in 2003. The Reading plant has been designated a "Tier 1" site by the American Chemistry Council, meaning highest priority. It is the only Tier 1 site within Rohm and Haas. The plant is a Tier 1 facility for two reasons —it has a railcar of chlorine onsite and the close proximity to neighbors. A security vulnerability assessment will be conducted in 2003. The CAC's input will be valuable with this issue.

2003 Meeting Schedule (Everyone)

February 13 Relocation of Air Toxics Monitor in the Reading Area, Citizen Odor

Sampling Program

March 13 Methyl Chloride Emissions Reduction Project Update

April 10 Shelter In Place, Increasing CAC Membership

May 8 Plant Tour, Presentation from Reading Junior/Senior High School

Environmental Club

June 12 Cancer Prevention/Information (tentative, ask Debbie Goodhart)

Relay For Life Information

July No Meeting

August 14 2002 Toxic Release Inventory Data September 11 Social Event (To Be Determined) October 9 Odor Reduction Project Update

November 13 Emergency Response, 2003 CAC Evaluation

December No Meeting

Backup topics for consideration: Plant Security

Tour Other Manufacturing Plants

Visit Another CAC

Community Service Projects

Announcements

- Suzie Bateman reminded the CAC that The American Cancer Society's Relay for Life would be June 13, 2003 at Reading Stadium. The CAC will have a relay team.
- Congratulations to Cheyenne Ritz, who got married in December. Her new last name is Gill.

The meeting adjourned at 8:10 p.m.

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Cincinnati Facility Community Advisory Council 2002 Evaluation Summary

Background

- The CAC has 24 members, 15-18 attend on a regular basis
- 24 surveys were mailed out in early November
- 15 surveys were returned (63% participation)

Survey Results

Aspects of CAC That Are Working Well

More than 80% of members felt that:

- CAC is working together to address EHS concerns of the plant and the community
- · CAC is developing ideas to improve and support local programs and activities in the City of Reading
- CAC's mission statement is appropriate
- their time on the CAC has been well spent
- they would like to stay on the CAC in 2003
- they are satisfied with the meeting style, meeting location, length, frequency, facilitator, and meeting minutes
- they are comfortable asking questions or raising concerns at meetings

Aspects of the CAC That Are Not Working Well

 86% said that we do not have the right mix of CAC members - need more Reading residents, fenceline neighbors, and school participation

Aspects of the CAC That Members Are Split On

- whether the CAC has enough members (29% said yes, 36% said no, 36% not sure)
- resolution of disputes (36% are satisfied, 29% are dissatisfied, and 36% are somewhat satisfied)

CAC Scorecard of Progress

LSS	<u>sue</u>	Average Score (0=no progress and 10=excellent progress)
@	Plant odor reduction	5.4
•	Emergency response notification	5.9
8	Methyl chloride emission reduction	6.2
•	Truck traffic on Bernard Ave.	6.4
0	Trucks - early arrivals	6.6
	Community relations	7.0
•	Neighbor/plant dialogue	7.3
٥	Shelter In Place education in communit	y 8.0

Voted Most Helpful or Valuable Meeting Topics in 2002

topics addressed at each meeting

- 1. odor reduction project updates methyl chloride emission reduction project updates
- 2. community relations updates
- 2. announcements of plant releases to air, land, water, sewer

featured topics

- 1. odor reduction plan
- 2. Shelter In Place program
- 3. B&B Riverboat trip
- 3. plant tour

Topics CAC Wishes to Address in 2003

topics addressed at each meeting

- 1. odor reduction project update
- 2. methyl chloride reduction project update
- 3. announcements of plant releases to air, land, water, sewer
- 4. community relations update

featured topics

- 1. odor reduction plan
- 2. community service project
- 3. tours of other local manufacturing facilities
- 4. Shelter In Place program
- 4. meet with other CAC's

Bottom Line: Areas For Improvement In 2003

- Increase CAC membership by adding more community members and neighbors.
- The issue with the most room for progress is odor reduction, followed by emergency response notification.
- Continue to focus on methyl chloride emission reduction project.
- Step up Shelter In Place education efforts.

1. General Membership

The following CAC mission statement was adopted in April 2001.

"The Rohm and Haas Community Advisory Council works together to address the health, environmental and safety concerns of the plant and the community, as well as develop ideas on how the CAC can improve and support local programs and activities in the City of Reading."

Do you feel the CAC has worked together to address the health, environmental and safety concerns of the plant and the community over the past two years?

Γ	YES	NO	NOT SURE
	11	0	2

Comments:

Slow work in progress, but going in the right direction.

R&H could do more to monitor odors and quantify odors reported by neighbors.

It is possible that not all odors are generated by R&H but no data for support is obtained.

We talk more about the safety of the company and what the company safety is.

Are trucks parking on R&H property a community concern? Odor complaints - progress. Community education - yes. Every meeting consistently shows that.

Has the CAC developed ideas on how it can improve and support local programs and activities in the City of Reading?

YES	NO	NOT SURE
13	1	1

Comments:

Shelter In Place

Taste of Reading, Reading Clean Up, and Shelter in Place are excellent forums.

I'd like to see more of this.

To a certain point, we need to talk about the immediate area more.

They are very involved in the community.

Shelter In Place

We have come a long way. There are more things that we can have an appearance at, and that has not been addressed extensively.

Do you feel the CAC's mission statement is still appropriate?

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NO 0 NOT SURE 1

Comments:

It's encompassing of our goals.

Should be reviewed by members.

It is vague. In this case it's good because it allows for change.

The CAC has 24 members, 19 of whom attend regularly. Do we have <u>enough</u> members on the CAC?

2-7		
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1	5	5
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If no, how many should we have?

35

at least 40

It's who is on the CAC, not how many.

30

25 who attend regularly (2 votes)

Do we have the <u>right</u> members? (Do we have enough variety and representation of Reading residents, fenceline neighbors, city personnel, plant employees, educators, interested citizens, etc?)

Y	ES	
	2	

	WYCCATC
NO	NOT SURE
7	5

If no, what type(s) of members would you like to see more of?

More fenceline neighbors.

More concerned community members and students.

Ward council members, school board.

More resident members.

More neighbors, interested citizens.

Educators, interested citizens.

Interested citizens, community groups.

Alliance for Chemical Safety and Reading Chamber of Commerce support.

City officials, more residents, businesses.

More community, more non-management plant employees too.

2002 CAC Evaluation Rohm and Haas Cincinnati Facility

15/24 Completed Evaluations

Are you an original CAC member?

YES 11 NO 3 NOT SURE 0

If not, when did you join? summer 2002 Sep-01 Mar-02

Do you wish to remain on the CAC in 2003?

YES 13

NO 0 NOT SURE

1

If not, why?

Has your time on the CAC been well spent?

YES 12 NO 1

NOT SURE

0

Comments:

I have learned a lot and feel that I bring a unique voice to the table.

Beginning was rough - enjoying now, hoping it becomes more productive to mission and goals.

I have not participated in the CAC as much as I would have liked, hopefully I will be more able to contribute in the future.

It has been informative.

It is interesting. I see some potential benefits for the Reading Junior/Senior High Environmental Club.

It is good to know what's going on - also learning new info about company and the community.

Relations between the plant and the community are improved, although invariably we do hit glitches.

2002 CAC Evaluation Rohm and Haas Cincinnati Facility

II. Meeting Schedule and Structure

Please rate the following from 0 to 10, where 0=totally dissatisfied and 10=totally satisfied.

	0	1	2	3	4	5	6	7	8	9	10	# at Responses	Average
Facilitator	0	0	0	0	0	0	2	0	3	2	8	15	8.9
CAC meeting style	0	0	0	0	0	0	1	3	7	1	3	15	8.1
Meeting Location (plant)	0	0	0	0	2	0	0	0	3	2	8	15	8.7
Meeting Frequency (monthly)	0	0	0	0	0	3	2	0	2	2	6	15	8.1
Meeting Duration (2 hours)	0	0	0	0	0	2	1	1	3	2	6	15	8.3
Timely Mtg. Reminders	0	0	0	0	0	0	0	0	5	2	8	15	9.2
Meeting Minutes	0	0	0	0	0	0	0	. 0	5	3	7	15	9.1
Resolution of Disputes	0	0	0	3	0	1	2	3	3	0	2	14	6.5

What should we change about the meeting structure or schedule? Nothing that I can think of, I'm very impressed with the structure.

Facilitator

Well organized, is pulling the group together well.

Bethany is doing much better.

Bethany is really growing as a facilitator and will only improve with more experience.

CAC meeting style
We could have a teambuilding activity.
Don't care for the meeting topics.
Most important parts are plant update and community input.

Meeting Location (plant)
Perfect place
Very secure, safe.
Ok, I think we need to meet at other locations occasionally.

Meeting Frequency (monthly)
perfect
Ok, should not skip months.
Meetings may not be needed as frequently.
Great.
Meetings should be every other month.

Meeting Duration (2 hours)
Original one hour was not enough.
Possibly shorten the meetings (no food) or make meetings every other month.
I think sometimes when we do have a good subject going, it is cut short.
2 hours should be a maximum.
Fine.

Timely Mtg. Reminders Always timely.

Fine, but stinks often.

Meeting Minutes

Seem thorough, always want slides or anything presented to be included too.

Resolution of Disputes
We could handle things differently and not spend so much time.
No control.
Disputes are brushed off too easy. We need to air them out more before moving on.

It seems as if dispute resolution is slow. Some items are a matter of resource commitment.

Trucks and odors always seem to be a problem.

This is where we could use some help. This is still an ongoing problem and odors are frustrating to members.

2002 CAC Evaluation Rohm and Haas Cincinnati Facility

III. Meeting Topics in 2002

Votes for the meeting topics that were more valuable or helpful in 2002.

General Topics (addressed at each meeting)	# of votes
Announcements of chemical releases to air, sewer, land, and corrective action	9
Safety updates (lost-time and recordable injuries)	3
Updates on odor reduction projects	12
Trucks parking outside plant gate	3
Truck traffic on Bernard Ave.	3
Update on methyl chloride emission reduction project	9
Community relations update	9
Featured Topics	
Plant's odor reduction plan	11
Plant's internal odor source survey results	6
Plant's employee medical surveillance program	3
Ohio Citizen Action's Campaign for Safer Neighborhoods Program	3
Shelter in Place Program	9
Plant's 2001 Toxic Release Inventory	6
data/results of RCRA site investigation	
History of Ohio River on B&B Riverboats	7
Plant tour	7
Sustainable development and Responsible Care	6

Comments:

Other ways to get more of the community involved; any issues that concern neighbors; an easily understand explanation of what the plant produces could be incorporated into the plant tour.

How about: evacuation of fenceline neighbors, air sampling of fenceline neighbors, ideas brought up by CAC members

The B&B Riverboat was a real treat.

The B&B Riverboat because it was a social gathering.

I liked all of the topics.

We need to repeat some topics such as the full odor reduction plan and methyl chloride plans for new members, even though we address them monthly.

2002 CAC Evaluation Rohm and Haas Cincinnati Facility

IV. Meeting Topics in 2003

Vote for the meeting topics you would like to address in 2003.	# of votes
General Topics (addressed at each meeting) Announcements of chemical releases to air, sewer, land, and corrective action Safety updates (lost-time and recordable injuries) Updates on odor reduction projects Trucks parking outside plant gate Truck traffic on Bernard Ave. Update on methyl chloride emission reduction project Community relations update	10 2 12 2 2 2 11 8
Plant's odor reduction plan Plant's internal odor source survey results Plant's employee medical surveillance program Ohio Citizen Action's Campaign for Safer Neighborhoods Program Shelter In Place Program Plant's 2002 Toxic Release Inventory data/results of RCRA site investigation History of Ohio River on B&B Riverboats Plant tour Sustainable development and Responsible Care	5 0 3 7 6 2 4
Examples of other CAC topics Community service projects Tours of other local manufacturing facilities Selection of plant scholarship winner Meet with other CACs (R&H and/or other companies)	10 8 2 7

Additional topics suggested:

Evacuation of fenceline neighbors, air sampling of fenceline neighbors, ideas brought up by CAC members How to stop odors and toxic releases.

Service project with the Junior/High School Environmental Club.

Clearer explanation of emissions vs. limits - water, air, etc.

Public image is distorted by media. R&H is allowed to emit within EPA, MSD guidelines.

Full plan on methyl chloride reduction and where we are in the progress.

V. Progress and Accomplishments

Please evaluate the <u>CAC's</u> progress on the issues listed below, where 0=no progress and 10=excellent progress.

	0	1	2	3	4	5	6	7	8	9	10	# of responses	Average
Plant odor reduction	0	0	0	4	1	2	3	2	1	0	1	14	5.4
Trucks -early arrivals	0	0	1	1	0	1	3	4	3	1	1	15	6.6
Truck traffic on Bernard Ave.	0	0	1	1	1	1	2	3	3	1	1	14	6.4
Methyl chloride emission reduction	0	0	0	2	0	1	2	3	3	0	0	11	6.2
Emergency response notification	1	1	∤1	0	0	1	2	4	3	0	1	14	5.9
Place education in the community	0	0	0	1	1	0	1	0	5	3	4	15	8
Neighbor/plant dialogue	0	0	0	2	0	1	0	4	4	1	3	15	7.3
Community relations	0	0	0	0	1	1	3	1	5	0	1	12	7

2002 CAC Evaluation Rohm and Haas Cincinnati Facility

How can the following issues be improved?

Plant odor reduction

Odors and truck issues are overdone, we need to address the situation when it arises and move on.

Continually in progress

Not sure how much the CAC has to do with odor reduction. Isn't that the result of plant monitoring and changes within the facility?

Keeping up to date on advance technology.

The plant needs to come up with a better plan.

Continue to keep open communication with neighbors and follow through with complaints.

Data collection at fenceline neighbors. Quantify extent of problem and verify source.

Keep addressing. Work closely with the Lehrter's.

Trucks -early arrivals

Continue program in place, making noble effort.

Continue working with drivers and companies.

Plant needs to work on the issue.

Continue to keep open communication with neighbors and follow through with complaints.

Provide secure lot within the facility. If trucks are willing to abide, allow entry. Turn others away. Is this so hard?

Keep being persistent.

Truck traffic on Bernard Ave.

Not plant's responsibility for enforcement, making good effort to communicate w/transportation companies to use alternate routes.

Continue working with drivers and companies.

Reading police need to work on the issue.

Continue to keep open communication with neighbors and follow through with complaints.

Increase signage. File customer complaints with violators. Use corporate leverage with contractors.

More policing.

Methyl chloride emission reduction

Engineering.

Not sure how much the CAC has to do with emissions reduction. Isn't that the result of plant monitoring and changes within the facility?

Keeping up to date on advance technology.

Needs to improve.

Continue to keep us informed.

Provide resources that appropriate technology.

This is highly technical info. - we'll need one big meeting at beginning of the year to fully update.

Emergency response notification

More time could be spent educating the public in this area.

Improve wherever it can be improved.

What emergency response notification?

Shelter In Place Education in the Community Continue with what is being done. Take out into community more. Good. Good handouts for events too.

Neighbor/plant dialogue

Keep doing what works.

If you are talking about neighbors and employees discussing odor issues, we still have a way to go.

Getting better for the most part. Need more community attendance.

Community relations acitivities Add more as membership increases

Work with city and schools.

It is a R&H project to better their name.

The CAC should do more within the community.

Do you feel comfortable asking questions or rasing concerns during CAC meetings?

YES	NO	NOT SURE
12	1	1

Do you believe your concerns or questions are being addressed?

YES ·	NO	NOT SURE
11	1	2

Please check all boxes below that apply. I am:

Fenceline Neighbor	Reading Resident	Plant Employee	Reading Official	Interested Citizen	Other
2	7	4	2	5	4

Closing Comments:

I think the CAC is a R&H program. I feel as a neighbor, we are not addressing problems we have.

The process is working, despite rocky start.

This is tough to evaluate after only one year, but we need to keep working to make all of the info easy to understand and welcoming to the community.



** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. – 8 p.m.

Thursday, April 10, 2003

Rohm & Haas Plant, Second Floor Conference Room 2000 West Street (Dinner will be provided)

Topic:
Increasing CAC Membership
Shelter In Place Booth Sponsorships

Please let me know by Tuesday, April 9, whether or not you will be attending the meeting. The plant remains under heightened security. You must RSVP for meeting and bring your photo ID. Members who show up for the meeting without notice are likely to be turned away.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany.dale@etc-online.com



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Thursday, April 11, 2002

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Rachael Belz, Director of the Cincinnati Chapter of Ohio Citizen Action (OCA) and CAC member, will be presenting information about OCA's Campaign for Safer Neighborhoods program. Her discussion will include the Rohm and Haas campaign and case studies from Cincinnati Specialties and AK Steel.

Please let me know by Tuesday, April 9 whether or not you will be attending the meeting. The plant remains under heightened security and I am required to leave the names of meeting attendees with the guard. Members who show up for the meeting without notice are likely to be turned away.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany@etc-online.com



AGENDA June 24, 2004 6:00 p.m. - 7:30 p.m.

Sign-In and Introductions Scholarship Presentation Dinner Plant Update

Community Issues Update

Announcements

TRI Presentation

All

Bruce Beiser

All

Bruce Beiser

All All

Curt Lambert



June 24, 2004 Meeting Minutes

Members Present

Bruce Beiser Rachael Belz Bill Ford Cheyenne Gill Chief Kevin Kaiser Joan Krimm Curt Lambert Margie Lehrter Jim Pfennig Tami Todd

Visitors Present

Joan Brunsman Amy Grote, 2004 academic scholarship recipient Linda Grote, Amy Grote's mother Paul Grote, Amy Grote's father Erynn McInnis

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone, reviewed the agenda, and asked the CAC members and visitors to introduce themselves. Bruce Beiser gave his plant update during dinner.

Special Visitor Welcome (Bruce Beiser)

Bruce introduced Amy Grote, recipient of a \$1,000 academic scholarship from the plant in 2004. Amy's parents, Linda and Paul, also attended the meeting. Amy was senior class valedictorian at Mt. Notre Dame High School and was involved in numerous extracurricular activities. Amy plans to study chemistry at Xavier University in the fall. If she maintains a 2.5 GPA or higher and continues her studies in chemistry, the plant will renew this scholarship each year. Bruce gave Amy a certificate, as well as several gifts (i.e., portfolio, bag).

June Plant Update (Bruce Beiser)

Safety

- No OSHA recordable accidents so far in 2004; it's been nearly a year since the last OSHA recordable accident at the plant.
- The plant has not experienced any first aid accidents since the last meeting.

Environment

Sewer

- No permit exceedances or deviations.
- Engineering work is underway on the plant sewer rerouting/modification project. The project will reroute sanitary and process waste from the south sewer to the west sewer. The south sewer will be converted to storm water only.

Air

 No permit exceedances or reportable releases. Plant has not exceeded its air permit for more than a year.

RCRA Site Investigation

• No analytical results received yet on soil and groundwater sampling conducted in spring 2004, as part of the Supplemental Work Plan.

Odor Complaints

- The plant received two formal odor complaints since the last meeting.
 - > 6/4/04 @ 4:05 p.m. unknown odor reported by neighbor.
 - > 6/5/04 @9:30 p.m. mercaptan odor reported by neighbor.

Margie Lehrter said she reported the mercaptan odor on June 3, *not* June 5. Margie also said she smelled a strong mercaptan odor around 3 p.m. on June 19 as she drove down Reading Road near the plant, but did not report the odor to the plant. (POST MEETING NOTE: Investigation of the wind direction on this date indicates the odor could not have come from the plant.) Margie said she smelled mercaptan one other time since the last meeting, but the smell didn't linger and she didn't log it.

Odor Reduction Project

• Odor controls brought on line May 10. System continues to operate.

Methyl Chloride Emission Reduction Project

- June's recovery efficiency was just over 95%. Slight reductions in efficiency seem to be due to higher ambient air temperatures. The current "annualized" emission rate for the year is 8.8 tons (or 2.7 tons since March 1).
- Curt Lambert's TRI presentation will give a better perspective on 2002 vs. 2003 methyl chloride emissions.
- Gas dryers are being constructed right now. Delivery is expected in late August.
- The second compressor train rebuild is scheduled for July. Once again, supplier has delayed delivery of parts.
- Still investigating Phase II cooling design (i.e., chilling system on vent gases). Will use methyl chloride as refrigerant for cooling. New valve will be installed next week, and testing will begin.
- Storage tank insulation work should be done by end of July.

Early Truck Arrivals

- Two early trucks since last meeting, which is an improvement over last month. One truck arrived at 5:10 a.m., but it was a first-time delivery and driver was not aware of the early truck arrival policy. The other truck arrived at 6:36 a.m.
- Plant has implemented a new policy of admitting trucks that arrive between 6:30 and 7 a.m., even though it will continue to stress no deliveries until 7 a.m. Plant is still issuing formal complaints to trucking companies that arrive before 7 a.m.
- Bruce advised Reading police that plant will call them about trucks parked at the field house parking lot (near the city pool).

Cost Reduction Plan

Rohm and Haas Cincinnati recently prepared a cost reduction plan to address economic pressures at the plant. This plan was approved by the executive council of corporate Rohm and Haas. The number of job eliminations at the site will be 15, which is about 10% of the workforce.

Relay for Life Event

- A number of plant employees, as well as CAC members, participated in the Relay for Life event at the Reading Veterans Memorial Stadium. The Relay for Life (total) raised \$35,000; there were eight less teams than last year. Weather was good this year. Event was successful.
- Q: A: How many jobs are going to be lost at the plant?

15 jobs.

Q: Is this job loss permanent?

I wouldn't say it's permanent, but right now it's what we have to do until we see some business improvement. Raw material prices (i.e., tin metal), natural gas prices and global competition (especially from China) are affecting us. We have to lower our costs. We have to make choices. We have done some things to improve productivity at the site, and now we're adjusting our workforce to match our current production levels.

How does your plant compare to other Rohm and Haas plants?

The Louisville plant is going through a 25% reduction. They're losing 119 people. A year and a half ago, we eliminated about 8 positions (administrative). This new job elimination will affect plant positions (i.e., operators, mechanics). The important thing for the CAC is that we're still investing in the facility (i.e., security upgrade, methyl chloride reductions. odor control).

2003 TRI Presentation (Curt Lambert, Plant Environmental Engineer) Please see attached slides as a summary of Curt's presentation.

NEXT MEETING: 6-7:30 p.m., Thursday, August 26, 2004

The meeting adjourned at 7:30 p.m.

Rohm and Haas CAC Meeting August 14, 2003

M. Curt Lambert EHS Engineer

Reading Plant

Rohm and Haas CAC Meeting TRI Overview

Section 313 -this section requires reporting of the environmental releases and off-site transfers of more than 575 different chemicals.

Of the 575, we are required to report on 8, based on exceeding certain thresholds.

Rohm and Haas CAC Meeting TRI Overview

For these 8 chemicals, we report

- · all air releases
- · the amount that goes to the sewer
- off site transfers (% in the waste streams)
- the quantity of a chemical treated by control devices prior to release.

Rohm and Haas CAC Meeting TRI Overview

What is the reporting threshold?

TRI chemicals are reportable if more than:

25,000 lbs of the chemical was manufactured or processed OR

10,000 lbs of the chemical was used but not in manufacturing or processing. These are usually chemicals that do not leave the facility as part of the facility's final product.

Rohm and Haas CAC Meeting TRI Overview

How did we calculate the amount that we reported?

The amount is estimated by calculating the releases and off-site transfers by one of the three basic estimation approaches:

- · Direct measurement
- · Mass balance
- · Emission factor

Rohm and Haas CAC Meeting TRI Overview

Aqueous Ammonia is used to make this stabilizers, and anhydrous ammonia is used to make phosphoniums. Almost all of the ammonia in both processes react to form a salt. Discharges from the stabilizer process contains some disolved ammonia, and discharges from the phosphonium process contains some unreacted anhydrous ammonia. The ammonia concentration in the wastewater is lower in concentration than that used for household purposes.

Water – ammonium chloride salt and ammonia discharged from the process goes to the sewer treatment plant of the MSD under the site's POTW permit (116,913 lb in 2003).

Air – During the processing, only a small quantity of ammonia is released to the air from the process vents. (898 lb in 2003).

Solid Waste - none

Rohm and Haas CAC Meeting TRI Overview

Lead is present in trace amounts in our tin ingots.

Air – Less than 0.2 lb of lead was emitted to the air in 2003. Lead emissions to the air are a result of burning natural gas or No. 2 fuel oil.

Water – About 186 lb of lead were sent to MSD in 2003. Virtually all of this amount is simply from the lead in the tin ingots.

Solid Waste – About 57 lb of lead were disposed as solid waste in 2003. This lead is also from the tin ingots.

Rohm and Haas CAC Meeting TRI Overview

Chlorine is a gas used in a closed system as a raw material.

Water - none

Air - 0 lb was released to the air in 2003. Our quarterly fugitive monitoring program detected no fugitive leaks from valves, flanges, and pipe connections. Furthermore, we experienced no accidental releases of chlorine in CY2003. Thus, chlorine air emissions were zero. We will report 1 lb of air emissions, since the fugitive monitoring is not continuous and since we use a significant quantity of chlorine.

Solid Waste - none

Rohm and Haas CAC Meeting TRI Overview

Chloroethane is used in the phosphonium process as a raw material.

Water - 8 lb

Air - 373 lb

Solid Waste - none

Rohm and Haas CAC Meeting TRI Overview

Benzyl chloride is used in the phosphonium process as a raw material.

Water - none

Air - 1 lb

Solid Waste - none

Rohm and Haas CAC Meeting TRI Overview

Methyl chloride (MeCl, or chloromethane) is used to make tin stabilizers. During processing, some of the MeCl is released to the air under two state permits (P017 and P019) and one federal permit (Title V). The permit limits are 55 tons per year and 70% control efficiency (although we have recently been operating at greater than 97% efficiency). We also operate under production limits and short-term emission limits.

Water - 3 lb

Air - 76,590 lb (38.3 tons)

Solid Waste - none

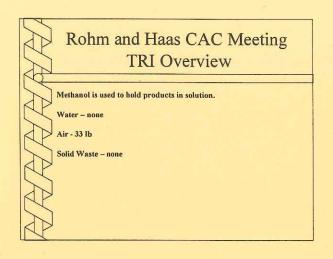
Rohm and Haas CAC Meeting TRI Overview

Glycol ethers are used in asphalt additives and are present in industrial soap and cleaners (e.g., Windex). Glycol ether usage may result in air and water emissions. Glycol ethers undergo biological treatment at the MSD.

Water - 2,824 lb in wastewater from industrial soap usage.

Air - 3 lb emitted to the air from the manufacture of asphalt additives.

Solid Waste - none



Rohm and Haas CAC Meeting TRI Overview

CHEMICAL	CY20D3 PROCESSED	CY2002 PROCESSED	PERCENT	CY2003 EMITTED	CY 2002 EMITTED	PERCENT CHANGE
Ammonia	2,035,662	2,122,567	-4.1%	203,981	212,437	-4.0%
Benzyl chloride	33,454	22,825	+46.6%	1	1	0%
Chlorino	2,284,133	1,970,724	+ 15.9%	1	1	0%
Ethyl chleride	16,385	40,453	-59.5%	381	563	-32.3%
Methenel	32,997	78,945	-58.2%	33	53	-37.7%
Mathyl chloride	4,717,568	4,942,164	-4.5%	76,593	93,033	-17.7%
Lond	473	584	-6.2%	243	244	-0.5%
Certain glycel others	23,443	41338	-43.3%	2.827	2.454	+15.2%



September 23, 2004 Meeting Minutes

Members Present

Suzie Bateman
Rachael Belz
Mayor Bo Bemmes
Carol Bullock Carpenter
Bill Ford
Chief Kevin Kaiser
Sister Joan Krimm
Dan Milz
Jim Pfennig
Earl Schmidt
Barb Stall
Margie Stall
Eric Walker (for Curt Lambert)

Visitors/Guests Present

Ruth Breech, Ohio Citizen Action
Kim Brough, Rohm and Haas
Terry Bemmes
Bruce Carpenter
Peggy Davis
Dave Gosse, Mill Creek Restoration Project
Lauree Kaiser
Susie Milz
Jill Norris, Rohm and Haas
Sister Louanna Orth, Mt. Notre Dame Convent
Peggy Riley, Rohm and Haas
Sandy Schoenberger, Rohm and Haas

Facilitator Bethany Dale

B&B Riverboat Dinner Cruise Covington, KY

The meeting was held in a private room on the second floor of the River Queen riverboat. Members and visitors convened inside the meeting room at 7:00 p.m. for a buffet dinner and the meeting. Due to the high level of the Ohio River, the boat was unable to leave the dock for the dinner cruise.

September Plant Update (Eric Walker) Safety

• The plant had one OSHA recordable accident when a contractor cut his finger.

Odor Complaints

• There were no odor complaints to report this month.

• The plant has had 6 complaints this quarter, compared to 11 in third quarter 2003, 18 in third quarter 2002, and 17 in third quarter 2001.

Methyl Chloride (MeCl) Emission Reduction Project

- Methyl chloride is a raw material used at the plant. It is the plant's largest air emission. The site goal is to operate the methyl chloride recovery system with 99% efficiency.
- Since March 1, MeCl emissions have been 4.4 tons. The control efficiency has remained fairly constant, fluctuating between 96-98%.
- The compressor upgrades are complete, and the dryer upgrades should be complete well before the end of the year.

• The facility is still investigating the use of an extra chiller on the tail end of the recovery system. Preliminary trials indicate that operating this chiller can increase the total recovery efficiency by about 1%.

Early Truck Arrivals

• The plant has a policy not to admit trucks for delivery prior to 7:00 a.m. due to disturbance to neighbors.

Since the last CAC meeting, the plant had two early truck arrivals, both on August 30.
JGL Transport arrived at 6:20 a.m. and Superior Carriers arrived at 6:40 a.m. This was
the first early arrival for JGL Transport. Superior Carriers had two early arrivals in
May.

Emergency Response

• In the past few weeks, the facility experienced several alarms of its fire water system to which the Reading Fire Department responded. Most of the alarms were false. The plant identified two problems causing the false alarms. One was a faulty water flow switch in the building 11/12 area. The second was faulty wiring in the building 40 area. Both have been repaired. There have been no false alarms since the repairs.

• The facility recently installed a new air conditioning system on building 19. However, the system was improperly wired by the manufacturer. When power was hooked up to the system, the wiring starting smoking. Employees noticed the smoke and initiated the

site emergency response system.

• The facility inadvertently ruptured a fire water main during an excavation, which caused the fire alarm system to be activated, and a response from the fire department. The water main has since been repaired.

Community Announcements

- The Neighbor-to-Neighbor picnic will be held the first Sunday, October 3 at Evendale Recreation Center from 2 p.m. 6 p.m. The event is free. There will be music, games and food for the whole family. Residents of Woodlawn, Deer Park, Reading, Lockland, Arlington Heights, Lincoln Heights, Amberly Village, Evendale and Blue Ash are invited. Rohm and Haas donated \$250 to the event.
- The State of Ohio report cards are out for the various school districts and Reading should be pleased to hear they went from an "effective" rating to "excellent" this year.

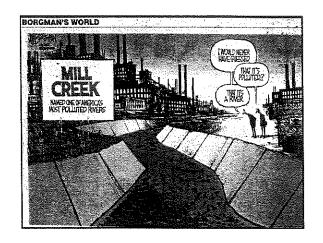
Life and History of the Mill Creek Presentation (Dave Gosse)

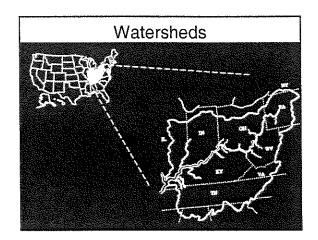
Please see attached slides as a summary of Dave's presentation.

The CAC thanked Dave for his informative presentation of the Mill Creek. Bethany thanked everyone for coming to tonight's meeting.

The meeting adjourned at 9:15 p.m. and CAC members and visitors went out on the boat deck.







What is a Watershed?

The geographic area that is drained by a certain body of water.

- Big: Ohio River or Mississippi River watershed
- · Small Mill Creek Watershed
- Subwatershed: West Fork Mill Creek watershed

The Mill Creek Watershed

- Linear length approx.
 28 miles
- Area approximately 166 Miles
- Central 1/3 Hamilton County, SE1/3 Butler County



Population

- 37 distinct political jurisdictions
- Approximately 866,350 people



Natural History

- · Mill Creek inhabited an abandoned channel of the Ohio River
 - Glacial till and sand present in floodplain and substrate composition
 - Made initial settlement attractive
- · Great natural species diversity found by early settlers and naturalists





Early Settlement

- Mill Creek watershed colonized from Revolutionary War Land Grant
- Agriculture, Timber Harvest, river-based trade
- 1790: negative impacts of unsustainable farming and deforestation: higher floods, longer droughts, decline in water quality noted
- 1881 only 15% original timber remained
- Transportation hub

Canals

- 1825 first canal authorization for SW Ohio
 - By 1845 canal traffic from Toledo to Cincinnati routine
- Canal system introduces additional flows to Mill Creek
 - Estimated an additional 35% increase in flows
 - Equals approximately 36 million gallons a day



Mills and Manufacturing

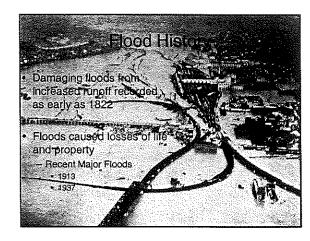
- · 1810s Distillery and beer-making
- · 1820s: Slaughterhouses / animal processing
- · 1828. Wool, paper, mills; box, wagon factories
- · Use city, surface, groundwater
- Discharge to Mill Creek; inputs exceed
- carrying/cleansing capacity

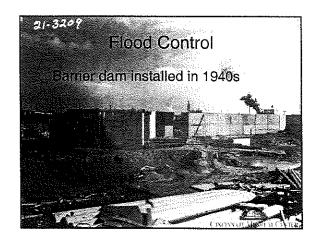
 Reduced filtration (wetlands); holding/carrying capacity (channel and floodplain) modification
 - 1835: Foul odor and discoloration noted

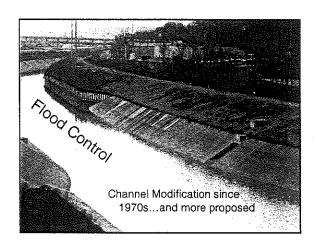
Sewage / Waste History

- · Initially dumped into Ohio R. or in underground vaults
- 1870s OK to dump in MC south of Cumminsville: downstream community "shantytown"
- 1880s inceased waste from "outlying" areas, city engineers say Mill Creek will be "open sewer"
- 1920s our modern sewage system constructed!
 - "wet-weather overflows" combined sewage overflo
 - Sanitary Sewers given overflows to keep



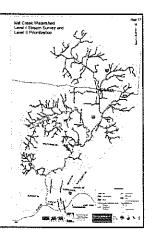






Major Impacts

- agriculture, land clearing, wetlands removal
- Transportation
- Population growth and sewage treatment
- Industry and impervious surfaces: point- and nonpoint source pollution
- Floodplain management and channel modification



Current Assessment

- History of overuse and cumulative impacts
- · Poor habitat
- · Poor filtration
- · Poor holding capacity
- Health/contact issues



Point Source Pollution

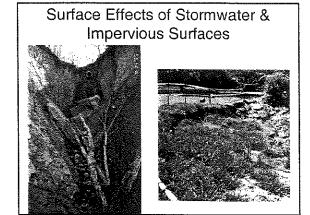
- Pollution that comes from an identifiable source
 - Common example: A pipe discharging to the creek
 - Process waste
 - Manufacturing byproduct
 - Solvents or cleaners
 - Regulatory authority Clean Water Act
 Act
 - Regulated through permits to a certain level
 - Permitting still relatively new (last 50 years)

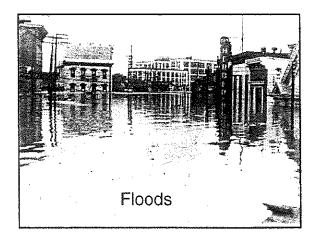


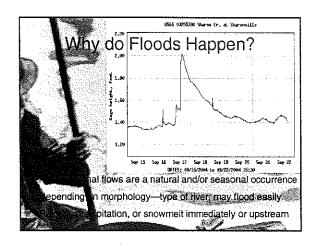
Non-Point Source Pollution

- Cannot be traced to 1 pipe: variety of sources
- Surface runoff and stormwater: precipitation cannot soak into the ground due to impervious surfaces
 - Driveways
- Parking tots
 Roots to downspouts to streets...
 Anything on our streets and parking lots:
 - Metals
- Motals
 Solid waste
 Too much flow: Instead of percolating into ground and discharging over time, goes into stream all at once
 Leads to ercsion; too much or wrong kind of sediment
 Cannot replenish groundwater aquifers









Flow Variation Is Beneficial

- · Replenishes sediment in floodplain
- Replenishes aquifer/groundwater
 - May discharge later to river through ground
 - Can cleanse/flush river system
 - Provides seasonal habitat for fisheries
 - Distributes riparian / aquatic plants/seeds

Flooding Factors

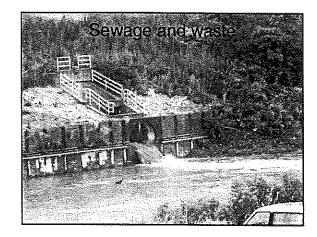
- Water velocity and storage
 - Wetlands, permeable surfaces, floodplains
 - Ex: parking lot vs. wooded lot w/ trees, grass
 - Ex: concrete ditch vs. winding channel w/ depth variation.
- Aggravated by increased flow/velocity
 - Stormwater/impervious surface runoff
 - Channel straightening
- Damaging floods occur when there is inappropriate /unsustainable development in the floodplain

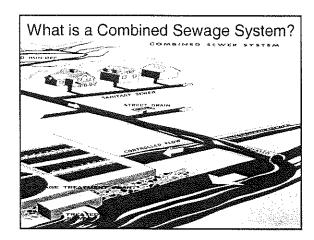
Flood/Flow Management

- · A certain amount of high flow is natural

 - Buildin a floodplain is assuming a certain amount of risk
 "50-year flood" or "100-year flood" -what does that really mean?
- Slow water's journey to river (counters earlier strategy):
 - Allow river to dissipate energy
 - Increase Groundwater storage capacity
 - Increase permeable surfaces
 - Increase riparian zones and buffers







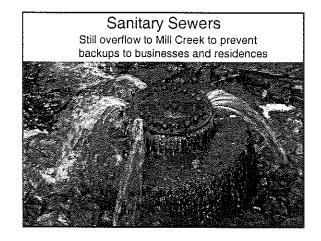
Combined Sewage Outfalls

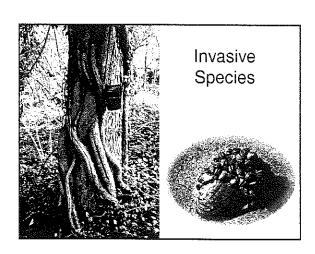
Works great in theory, until:

- · Storm event too severe
- Bad/unsustainable development allows for too much impervious surface, resulting in rainfall draining all at once

- · Too much water threatens to destroy pipes
- · It ALL bypasses treatment and overflows to Mill Creek!







Why are Invasives Bad?

- Thrive in displaced habitat -- outcompete native species ry
 - May not provide the same environmental or conservation services
 - Ex: zebra mussels v. native mussels
- · Often very hardy and hard to remove
- Prolific nature can damage ecosystem / change interdependency of system

Invasive Species

- Currently we're working to remove or prevent
 - Winter Creeper
 - Japanese
 Honeysuckie
 - Zebra Mussel
- Volunteer help is critical and results are immediate!



Why is natural habitat and biodiversity important?

- · Aesthetic and public use values
- Biodiversity can better support natural processes
- Natural processes more cost effective at processing waste
- May support future research/drugs, etc. not yet discovered
- Most religions stress some sort of environmental stewardship
- Environmental interaction, ecosystems more complex and interdependent than previously thought



Mill Creek Restoration Project

- Formed in 1994 with assistance from industry settlement
- Founded through Rivers Unlimited



To reclaim, restore, or regenerate Mill Creek watershed; provide environmental education and training for people of all ages, assist in sustainable development

Reclaiming Mill Creek watershed

Reconnect the population with its watershed

- · Education programs
- · Greenway and recreational opportunities



Reclaiming Mill Creek watershed

Training and promotion for sustainable economic growth within the watershed





—you CAN have both a sound environment and healthy economy!

Restore, Regenerate, Reclaim watershed

Fie-establish natural physical (geomorphic and chemical)
parameters

- Provide opportunity for habitat restoration
- · Provide opportunity for compatible use/growth
- Assist in damage reduction and restoration of floodplains
- · Assist in nutrient/pollutant filtration/reduction
- Provide backdrop for recreation/aesthetic opportunities
 - Will raise property values

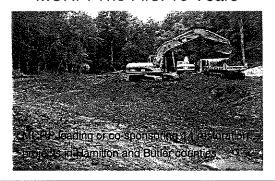
MCRP: the First 10 years

Completed Mill Creek
Watershed Greenway
Master Plan

- 150 groups and organizations participated
- MCRP is spearheading implementation of greenway projects in the watershed



MCRP: The First 10 Years



MCRP: The First 10 Years

 Interdisciplinary environmental education program for 20 middle and senior high schools in 10 school districts.





MCRP has served over 9,000 students, 200 teachers and community volunteers.

MCRP in 2004

- · Volunteer field days
- Raising awareness throughout watershed
- Build consensus for sustainable use of watershed







MCRP in 2004

- Water quality monitoring, Environmental Education
- · Technical competencies





MCRP in 2004 — Action Projects • Streambank and instream restoration — Caldwell Park — Seymour Preserve — Butler County (Beckett Ridge) — Butler County (Union Center/Cassinelli) • Fall, Spring streambank stabilization courses • Provide technical expertise and consensus building where needed



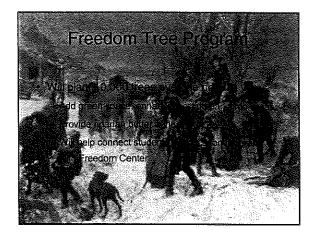








Freedom Tree Program In cooperation with the National Underground Railroad Freedom Center and Sand Run Nurseries Place Connection: Mill Creek watershed was



Stormwater Treatment Wetland Demonstration Project

If heavily used by slaves escaping on the

 "Laughing Brook" small constructed wetland to filter runoff from parking lot

underground railroad-

- Porous sculptures will grow moss and provide more filtration
- Future Trail and accessible location at Salway Park



Laughing Brook

 MCRP and artist Jackie Brookner worked with 10+ high school students from Artworks to create sculptures



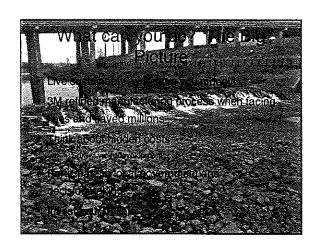


•Installation in Fall 2005

Greenways

- Connect parks and recreational areas in watershed through use of greenways
- Provide access to parks and recreational areas to underserved populations
- Connect Mill Creek greenway to larger system of trails in Ohio

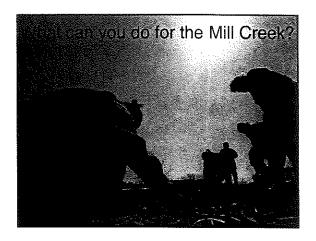




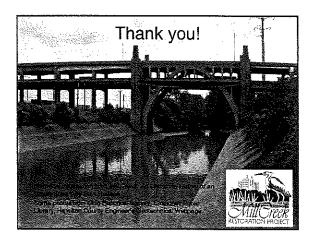
Managed Natural Processes less expensive and lower maintenance than replacement



- · Treatment wetlands
- Wastewater treatment
- · Flood control / channel modification
- Erosion / riparian corridors









AGENDA May 27, 2004 6:00 p.m. — 7:30 p.m.

Sign-In and Introductions All
Plant Safety Orientation All
Plant Tour All
Dinner All

Plant Update Bruce Beiser

Community Issues Update All Announcements All

Next meeting is 6 p.m., June 24, 2004. Topic is the plant's 2003 Toxic Release Inventory (TRI) report.



Cincinnati Facility Fact Sheet

2000 West Street, Reading, OH 45215

The Rohm and Haas Cincinnati facility has seen many changes since it was founded in 1940 in Reading, a northern suburb of Cincinnati. Since that time, the plant has remained an integral part of the community, dedicated to its employees, customers and neighbors.

Products Manufactured in Cincinnati

The plant produces specialty chemicals such as thermal stabilizers, waxes, lubricants and asphalt additives. These products are not sold to consumers; rather, they are used by other industries to produce better-performing, high quality end-products and finished goods. Products manufactured by the Cincinnati plant

are used to make vinyl siding and windows, gutters and downspouts, PVC pipe and fittings, plastic bottles and food containers, blister packaging and epoxy resins.

These products are produced, packaged and shipped by a very knowledgeable, highly experienced work force.



Rohm and Haas Company

Rohm and Haas is one of the world's largest manufacturers of specialty chemicals – technologically sophisticated materials that find their way into

applications in a variety of



Rohm and Haas has:

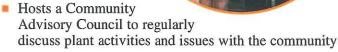
- 17,000 employees
- 100 research and manufacturing locations
- Operations in 25 countries
- Annual sales of approximately \$5.7 billion
- Worldwide headquarters in Philadelphia, Pennsylvania
- More than 100 ISO 9000 and 25 ISO 14000 registrations

Cincinnati Facility

- 150 employees with an average 16.5 years of service
- Non-union facility
- 33-acre site
- 24/7 operation
- ISO 9002 certified since 1993
- Annual sales of approximately \$100 million
- Exports approximately 50% of products manufactured
- More than \$420,000 paid in local taxes
- \$50,000 contributed annually (company and employee) to community events/partnerships
- Member of the Alliance for Chemical Safety, the Ohio Chemistry & Technology Council, the American Chemistry Council and the Reading and Greater Cincinnati Chambers of Commerce

Community Partnerships

The Cincinnati facility is a good neighbor and an active part of the community. This is demonstrated by the many community and educational partnerships supported throughout Reading and the Greater Cincinnati area. Here are just a few of the facility's initiatives:



 Sponsors a \$1,000 renewable scholarship for Reading High School students entering a college program in chemistry or chemical engineering



Community Partnerships Continued

- Volunteers with the Junior Achievement program
- Organizes an annual facility-wide fund raising drive for United Way
- Sponsors a Black History Month essay contest for local elementary school students
- Hosts a Community Open House every five years and regularly offers guided plant tours
- Participates in a co-op program through the University of Cincinnati, College of Engineering
- Organizes an annual employee blood drive in cooperation with Hoxworth Blood Center
- Donates site property for community use as baseball and soccer fields

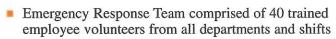
Environment, Health and Safety Principles

The Cincinnati facility is committed to full compliance with all environmental, health and safety regulations.

Additionally, Rohm and Haas participates in the American

Chemistry Council's

Responsible Care®
program. Through this
program, members are
committed to
continually
improving
environmental,
health and safety
efforts, and engaging
in public dialogue.
Highlights of the
plant's EHS program



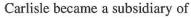
include:

- Comprehensive employee health surveillance program
- Community Odor Hotline at (513) 733-2135
- Community Plant Update Line at (513) 733-2250 that provides recorded information about conditions at the plant in the event of any spills, fires, serious injuries, unusual odors or loud noises
- Railcar storage area connected to a 400,000 gallon water deluge system
- Storage tanks surrounded by large concrete dikes to contain accidental spills
- Chemical leak detection systems with alarms

An Impressive Facility History

The Cincinnati facility has an extensive history and long line of ownership. Originally built in 1940 and known as the Carlisle Chemical Company, the

facility produced a single product - a soluable base - that was first formulated in the owner's basement. Soon after, the United States was drawn into World War II and the young company flourished because its products were essential in the war effort. In 1948,



Cincinnati Milling Machine Company. With that, the facility added a state-of-the-art chemical lab and along came new ideas, products and customer requests. In 1980, Carlisle became a subsidiary of the Thiokol Corporation known as the Carstab Corporation, which was a larger chemical company. In the next few years, Thiokol merged with Morton-Norwich Products, Inc. to form Morton-Thiokol. In 1989, Morton-Thiokol split. The

Cincinnati facility became part of Morton
International, Inc., as it

remained until 1999, when Morton became a whollyowned subsidiary of the Rohm and Haas Company. Today, the

Cincinnati facility is a vital part of the Rohm and Haas Company.

For More Information

For more information about the Cincinnati facility, visit us online at:www.rohmhaas.com/cincy or call Bruce Beiser, plant manager, at (513) 733-2179.





May 27, 2004 Meeting Minutes

Members Present

Bruce Beiser
Rachael Belz
Carol Bullock-Carpenter
Bud Elmlinger
Cheyenne Gill
Chief Kevin Kaiser
Curt Lambert
Dave Lehrter
Dan Milz
Jim Pfennig
Earl Schmidt
Tami Todd

Visitors Present

Karen Arnett, ECO
Paula Bemmes
Bob Boehner, Reading City Council
Ruth Breech, Ohio Citizen Action
Pat Lapple, City of Reading
Kevin Parker, former Reading City Council

Facilitator

Deb Leonard

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bruce Beiser welcomed everyone and then split the CAC participants into two different groups for the plant tour. The first group left for a plant tour with Bruce Beiser, while the second group ate dinner. After the second group left for a plant tour with Curt Lambert, the first group returned and ate dinner. After the second group returned from the plant tour, Bruce Beiser gave a plant update.

Plant Tour

Security System

• Doug Burdick gave an overview on the plant's recently upgraded security system.

Railcar Area

• The tour included an overview of the plant's railcar area.

Buildings 11 and 12: Methyl Chloride Reduction Project

- On the day of the tour, the methyl chloride recovery system was operating at 97.4% efficiency.
- In 2003, the average efficiency was 88%.
- Over the last 12 weeks, the efficiency has been more than 97%.
- Control room has emergency shutdown capability for methyl chloride system.

Building 3/3A Complex: Odor Reduction Project

- New articulating valve arms are used to capture odors from drum/tote loading areas and filtration areas. The odors are discharged through a 40-foot stack on the roof.
- New wall registers (general building ventilation) send fugitive odors to the 40-foot stack. The previous wall vents used to send the odors directly outside the building.
- Q: How did you determine the height of the stack?
- A: The plant used a U.S. EPA air dispersion computer model called SCREEN3. We used 5 ppb as the target concentration.

April Plant Update (Bruce Beiser)

Safety

- No OSHA recordable accidents so far in 2004.
- The plant has gone 600 days since the last lost-time incident/injury.
- The plant has not had any first aid accidents since the last meeting.

Environment

Sewer

- No permit exceedances or deviations.
- The plant presented MSD with a plan for the sewer rerouting/modification project. The Permit To Install (PTI) was submitted today to MSD and Ohio EPA.

<u>Air</u>

- No permit exceedances or reportable releases.
- The plant submitted a Title V compliance report this month. Some issues need to be resolved: there were two late fee payments due to problems getting checks out of corporate, and a meter calibration issue.

RCRA Site Investigation

- The first quarter 2004 interim report has been issued.
- On the supplemental work plan, all activities have been completed (i.e., soil and groundwater sampling, additional wells). No analytical results yet they are due next month.

Odor Complaints

- The plant received two odor complaints since the last meeting.
 - > 5/7/04 @7:05 p.m. mercaptan odor reported by neighbor.
 - > 5/7/04 @9 p.m. mercaptan odor reported by neighbor.

All systems were normal, but production personnel recharged odor scrubber biological solution anyway.

Odor Reduction Project

- Odor controls brought on line May 10. Note: Last odor complaint was May 7.
- Existing wall fans were shut off on May 17.

Methyl Chloride Emission Reduction Project

- More than 97% efficiency for last 12 weeks (Post Meeting Note: Average efficiency has been 98.3%). Curt Lambert "annualized" the actual emission rate of the past 12 weeks to be about 6.3 tons from the process point source, as compared to a typical 40 tons per year total. An additional 3 tons per year may be emitted (on top of the 6.3 tons), due to fugitive emissions.
- Plant goal is still under 10 tons of potential emissions.
- Plant is experiencing a slight drop off in efficiency in last couple of weeks due to warmer temperatures. Therefore, plant is continuing the Phase II cooling design (i.e., additional cooling of remaining gas).
- Gas dryers are ordered and under construction.
- The first compressor rebuild was completed this month. The second is scheduled for next month.
- Compressor system not working perfectly. Compressor is not pushing all the gas forward, so some gas is slipping back to earlier stages and being recompressed.
- insulation work should be done by end of June.

Security Upgrade

• CAC participants viewed the security upgrades during the plant tour. Bruce Beiser was interviewed by WCPO (Channel 9) for a story on plant security.

Early Truck Arrivals

- Major regression on early truck arrivals. 10 early trucks since last meeting, all between 6:15 and 6:45 a.m.
- Might be due to USDOT changes in driver hours.
- In response, plant asked a materials and handling employee to start work at 6:30 a.m. to handle all truck arrivals between 6:30-7:00 a.m. Plant will still handle each early arrival the same way, but won't let a truck sit outside the gate if they arrive early.
- Trucks are also parking at the adjacent city pool. Although it is the city's responsibility to handle that issue, plant guards are notifying local police when they observe it.

Plant Community Relations Update

- Eleven plant employees volunteered for the Flying Pig Marathon and one employee, Doug Burdick, ran it.
- Rohm and Haas awards an annual scholarship to local graduating high school seniors who plan
 to major in chemistry or chemical engineering in college. This year, the plant has been unable
 to identify a suitable candidate. If anyone knows someone planning to major in either subject,
 please contact Tami Todd, HR, at the plant.

- Q: A: Were the old wall fans on Building 3/3A complex blowing air out?
- Yes, they were exhaust fans.
- Q:
- Are the trucks just a little bit early? They arrived between 6:15 and 6:45 a.m. Ã:
- Is it one truck at a time?
- Q: A: It's been one truck every day, except for one time this week when there were three early truck arrivals.
- Has the plant always monitored early truck arrivals or is that a result of the CAC? It was the result of concerns and complaints from the community. Q: A:

NEXT MEETING: 6-7:30 p.m., Thursday, June 24, 2004

The meeting adjourned at 8:00 p.m.



AGENDA April 22, 2004 6:00 p.m. — 7:30 p.m.

Sign-In and Introductions

Dinner

Plant Update

Community Issues Update

Announcements

Citizen Air Sampling Program

Odor Control Project Update

All

All

Bruce Beiser

All

All

Michael Fair, HCDOES

Curt Lambert

Next meeting is 6 p.m., May 27, 2004. Hope you can make the plant tour!

Tank catches fire, forcing evacuation

By Dan Klepal and Matt Leingang The Cincinnati Enquirer

MIAMITWP.-A fire in a 6,000-gallon petroleum tank holding an asphalt-type material at the Marathon-Ashland facility on Brower Road Saturday forced the evacuation of a county park and prompted emergency officials to ask nearby residents to stay inside with doors and windows shut for several hours

No one was injured in the fire, and the "shelter in place" advisory lasted a little more than two hours.

Pressure inside the tank after the fire started caused the hatch on top to burst open, as it is designed to do. The first firefighters on the scene reported seeing flames coming from the hatch. They used hand-held air monitors to check for hydrogen sulfide, a potentially lethal gas that attacks the respiratory system. None was detected. Firefighters sprayed the outside of the tank to put out the fire.

Linda Casey, a spokeswoman for Marathon-Ashland, said the company doesn't know how the fire started. The thick black substance, used in making clay pigeons, graphite golf clubs and electrical



The Cincinnati Enquirer/ ELIZABETH KANE

probes, won't burn unless it's exposed to temperatures of 500 degrees or greater, she said.

Miami Township Fire Chief Jim Hughes said the warnings to residents were precautionary. "In my view, no one was ever in any danger," he said.

Myron Hamilton, a 38-year-old resident of the nearby Shaker Village subdivision off Mount Nebo Road, agreed. He was fishing with his two sons at a pond in the subdivision when the fire started. His wife called on his cell phone to warn him. Hamilton said he didn't even smell the fire.

"It was no biggie," he said.

E-mail dklepal@enquirer.com and mleingang@enquirer.com



April 22, 2004 Meeting Minutes

Members Present

Suzie Bateman
Bruce Beiser
Rachael Belz
Bill Ford
Chief Kevin Kaiser
Joan Krimm
Curt Lambert
Dave Lehrter
Margie Lehrter
Dan Milz
Barb Stall
Margie Stall
Tami Todd

Visitors Present

Ruth Breech, Ohio Citizen Action Flo Edelmann, Mt. Notre Dame Michael Fair, Hamilton County Dept. of Environmental Services

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone, reviewed the agenda, and asked the CAC members and visitors to introduce themselves. Bruce Beiser gave his plant update during dinner.

April Plant Update (Bruce Beiser) Safety

- No OSHA recordable accidents:
- The plant had one first aid incident when a research technician cut a finger on a broken glass tube.

Environment

Sewer

- No permit exceedances or deviations.
- Met with MSD to review plans to convert south sewer to clean storm water only. Will divert process industrial waste to the west sewer outfall.

Air

No permit exceedances or reportable releases.

RCRA Site Investigation

- Contractor work (performed by Geomatrix) resumed at the site on March 8.
- Geomatrix conducted soil borings, installed additional wells and excavated soil.

Odor Complaints

- Three odor complaints
 - > 3/28/04 @3:20 p.m. rotten egg odor reported by Geomatrix.
 - ➤ 4/08/04 @11:25 p.m. glycolic acid odor reported by employee.
 - ➤ 4/14/04 @ 11:30 p.m. mercaptan odor reported by employee.
- Margie Lehrter reported that she called in a complaint on 4/12 at 7:19 a.m. and nobody answered the phone. After trying several times, she left a message on voice mail but never received a return phone call. She also informed Bruce and the CAC that the past few times she has called in odor complaints, nobody is taking information from her as to the type of odor, when it occurred, who the caller is, etc. And there has been no follow-up after the complaint was made. Bruce is going to follow-up on both of the above-mentioned issues. [POST-MEETING NOTE: Curt discovered that this instance was caused solely by his oversight. Margie's message was taken by the boilerhouse operator and immediately investigated by the shift supervisor, who promptly relayed the information to Curt, per plant procedure. However, Curt did not include this particular odor complaint on the monthly tally. Curt has apologized to both Bruce and Margie for his error.]

Odor Reduction Project

- The installed ductwork has been connected to the fan intake.
- The power and control wiring was installed this week during a production shutdown.
- Curt Lambert will be giving a project update later tonight.

Methyl Chloride Emission Reduction Project

- All three new meters have been installed on one compressor train.
- Have achieved over 97% efficiency for the past seven weeks (current annualized rate of 9.7 tons). We aren't sure what impact summer temperatures will have on the system.
- The gas dryers phase of the project have been approved.
- Compressor rebuilds scheduled in April and May.
- Still investigating Phase II cooling design (i.e., additional cooling of remaining gas). Will it be needed due to summer temperatures?

Early Truck Arrivals

- Bruce reported two early trucks the week of April 5. The first one was reported at 6:15 a.m. and was a customer pick up (first time offense). The other was reported at 6:45 a.m. and was a carrier for a shipment (previous offense 5 months ago).
- Margie Lehrter reported early trucks in the pool parking area on 4/19, 4/20 and 4/21. It
 was reported to her that the Rohm and Haas guards are telling the truck drivers they can
 park in the pool parking lot. Bruce said he would follow-up with the security guards.

Chief Kaiser advised anyone who saw trucks parked there to call the Reading police who will come ticket the drivers.

Plant Community Relations Update

- The plant is getting volunteers together for Clean Up Reading day on April 29. The plant also made a financial donation to the event.
- Plant continues to identify cost reduction opportunities. The plant has not announced the number of job losses yet The CAC discussed the driving factors of the cost-competitive situation facing Rohm and Haas.
- Several employees have started their Junior Achievement classroom teaching for Hill Top Elementary (third and fifth grades).
- The plant has nine volunteers working a water station at the Flying Pig Marathon on May 2 to benefit the Tri-State Parkinson's Wellness Center. CAC members are invited to help if interested.
- Q: Isn't there a local environmentalist that travels down the Mill Creek in a canoe during clean up days?
- A: Yes. His name is Bruce Koehler. I think he works for OKI (Ohio-Kentucky-Indiana Regional Council of Governments. He takes a crew out to clean up the creek.
- Q: What does Ohio Citizen Action do?
- A: We work with citizens on environmental issues. We try to get facilities to work with their neighbors. Most of the issues the CAC is working on were the issues that neighbors had with Rohm and Haas.
- Q: Where is Ohio Citizen Action located?
- A: In Cincinnati and other cities in Ohio.
- Q: How is Ohio Citizen Action funded?
- A: Citizen funded we have 100,000 members in Ohio.

Citizen Air Sampling Program by Michael Fair, Hamilton County Dept. of Environmental Services (HCDOES)

- Michael brought a specially-lined SUMA air sampling canister for the Lerhters to use when they detect a mercaptan odor. Michael demonstrated how to collect an air sample and complete a chain of custody form. HCDOES requests that wind speed, direction, location of the sample and names of any witnesses are noted on the chain of custody.
- Michael explained a neighbor may smell what he feels is a very strong odor, but the lab may come back and not have detected anything. The human nose is probably thirty times more sensitive to mercaptans than lab analysis.
- The samples are \$300 each. The canister is very easy to use.
- Q: How important is knowing the wind speed and direction when we take a sample?
- A: Use your best guess. Our agency will go back and look at the weather records.
- Q: Do you have to have the chain of custody notorized?
- A: No. When you take the sample, you are swearing that the information is accurate and the sample was taken in accordance with procedure.
- Q: Do the Lehrters call you once they have taken the air sample?
- A: Yes. Call us immediately. Best case, it will take us 30 minutes to arrive at your house.

Q: Is it important to take the sample outside?

A: Yes. You would not want to take the sample inside your house.

Odor Control Project Presentation by Curt Lambert

Please see the attached slides for a summary of Curt's presentation.

Q: How tall is the new ventilation stack?

- A: It is 80 feet off the ground, or about 40 feet above the building roof.
- Q: Does the plant buy or sell emissions?

A: No, we do not.

Q: Will you continue to use the existing odor control scrubber?

A: Yes.

- Q: I have noticed two plumes coming from the plant. What is coming out of those stacks? Is that a source of odors?
- A: We have a boiler house that emits steam, but that should be the only plume. The steam would not be a source of odors. (Margie Lehrter asked if Curt could walk her around the plant sometime next week so she can point out what she is referring to. Curt agreed. Bethany reminded the CAC that a plant tour is scheduled for May's meeting.) [POST-MEETING NOTE: Curt and Margie were unable to meet during the week of 04/26/04. They will look at the steam plumes during the CAC tour on 05/27/04.]

Q: There is an odor tonight, is something not running?
A: The new system is not operating yet. There are still

A: The new system is not operating yet. There are still a few tie-ins that need to be done. This new system is not going to eliminate all odors. There are times when odors may be detected, but the frequency and intensity should decrease significantly.

Q: Your list of odor complaints seems low.

A: If there is more than one complaint in a short amount of time (i.e., three complaints in two hours), they are all logged as separate odor complaints. This list does reflect the actual number of calls that come in, but overestimates the number of "odor incidents," since some incidents have multiple calls.

Michael Fair added that Rohm and Haas' list parallels what HCDOES sees across the region. Generally speaking, the number of complaints increase during September and October.

Q: Will the air coming out of the stack vary in summer and winter months?

A: The worst odor complaints occur when the air can't disperse in high hur

A: The worst odor complaints occur when the air can't disperse in high humidity conditions. Our modeling numbers are based on worst-case meteorological conditions so hopefully the fence-line numbers will be below the detection level even on the worst days.

Q: Is the tank on the roof of the building an overflow tank?

A: Yes. That surge tank is designed for safety. It will collect any excess pressure from a vessel so that it can be contained.

Q: Could we smell odors if that surge tank fills up?

A: Probably, but we haven't had that tank fill up in years. We now have better ways to monitor our processes so instances like that become more and more infrequent.

- Q: A: Why is the tank on the roof and not inside the building?
- That was the most convenient place for it when it was installed.
- Q: When was the tank installed?
- A: That particular surge tank was installed in 1976 when the building was built. All the other buildings have surge tanks now.
- Q: A: How much has this project cost the plant?
- \$500,000.
- Q: A: What type of metal are the pipes made of? Stainless steel.
- Who did the work for you?
- Q: A: Local contractors installed the duct work. The engineering was done by Rohm and Haas' corporate engineering group and by Jacobs Engineering.

In closing, the CAC said they were impressed with the odor control project design. Members are optimistic that it will be effective in greatly reducing odors.

NEXT MEETING: 6-7:30 p.m., Thursday, May 27

The meeting adjourned at 7:30 p.m.



AGENDA March 25, 2004 6:00 p.m. — 7:30 p.m.

Sign-In and Introductions

Dinner

Plant Update

Community Issues Update

Announcements

Status of RCRA Site Investigation

All

All

Bruce Beiser

All

All

Mark Hemingway, Geomatrix

Next meeting is 6 p.m., April 22, 2004. Hope to see you there!



March 25, 2004 Meeting Minutes

Members Present

Suzie Bateman
Bruce Beiser
Rachael Belz
Mayor Bo Bemmes
Carol Bullock-Carpenter
Beth Ellis
Bill Ford
Cheyenne Gill
Chief Kevin Kaiser
Joan Krimm
Dave Lehrter
Barb Stall
Margie Stall
Tami Todd
Eric Walker

Visitors Present

Mark Hemingway, Geomatrix
Tim Jennings, Geomatrix
Charles Young, Geomatrix
Carl Coker, Rohm and Haas (corporate office)
Ron Lantzy, Rohm and Haas (corporate office)
Sarah Gehring, Reading Junior/Senior High School Environmental Club
Theresa Gehring, Reading Resident

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone, reviewed the agenda, introduced the speakers, and asked the CAC members and visitors to introduce themselves. Bruce Beiser gave his plant update during dinner.

March Plant Update (Bruce Beiser) Safety

- No OSHA recordable accidents.
- No first-aid incidents.

Environment

Sewer

- No permit exceedances or deviations.
- MSD visited the plant for a quarterly sampling event. Rohm and Haas split the samples with MSD. The plant received their lab results and there were no chemical detects.

Air

• No permit exceedances or reportable releases. It has been over a year since the plant has had an air release.

RCRA Site Investigation

- Contractor work (performed by Geomatrix) at the site resumed on March 8.
- Geomatrix conducted soil borings, installed additional wells and excavated soil.
- Presentation tonight by Geomatrix geologist, Mark Hemmingway.

Odor Complaints

- Two odor complaints
 - > 2/26/04 @12:00 p.m. amine odor reported by site employee.
 - > 2/27/04 @3:40 p.m. rotten egg odor reported by neighbor.
- Kerri Castlen, Hamilton County Dept. of Environmental Services, has identified a lab that can perform an air sample analysis for sulfur compounds. She would like a fence line neighbor to take another air sample. Bethany Dale explained that Dan Milz has the air sampling canister. She is going to get it back from him and deliver it to Dave Lehrter, who agreed to take another sample.

Odor Reduction Project

- On Wednesday, the platform and equipment was placed on the roof of building 3/3A.
- The installed ductwork needs to be connected to the fan intake.
- The electrical and control wiring will be installed by mid-April during the next production shutdown. (Bruce passed around photos of some of the recent project work.)
- Project to be complete before next CAC meeting.

Methyl Chloride Emission Reduction Project

- All three new meters have been installed on one compressor train.
- Current recovery efficiency is 98-99% since the implementation of the new digital control system.
- Work continues on the design of the gas dryers and instrumentation.
- Compressor rebuilds scheduled for April.
- Investigating Phase II of the project (i.e., additional cooling of remaining gas, if needed).
- Q: I noticed the plant received an air permit in 2003 that allows you to emit 55 tons of methyl chloride emissions. Is that your Title V permit?
- A: Yes, our Title V permit was issued in April 2003. This permit allows us to emit up to 55 tons of methyl chloride per year. If we can get our emissions under 10 tons/year, we will no longer be subject to federal HAP regulations (MACT standard) because we will be a minor source of HAP emissions. Also, if the plant achieves this, we will no longer be subject to Title V Clean Air Act regulations.

Q: What happens when you get your emissions drop below 10 tons/year? Will you get a new permit?

A: Our Title V permit expires in 2008. If we get below 10 tons/year, we will just let it expire.

Plant Security Upgrades

- Reading Fire Chief Kevin Kaiser and Reading Police Chief Hilling conducted a verification audit of the plant to ensure that all security risks identified in the vulnerability assessment have been addressed and implemented.
- Most of the security upgrades are visible. The plant is still fine tuning some of the systems.

Early Truck Arrivals

• There were 2 early truck arrivals in March. One arrived at 3:00 a.m., the other at 6:30 a.m. One truck was a repeat offender and they received another warning. (The last early truck arrival was on December 23, 2003.)

Plant Community Relations Update

- Bruce Beiser spoke to the Reading Kiwanis on March 10 about the site, chemical industry and the CAC.
- Several R&H employees have started their Junior Achievement training for Hill Top Elementary (third and fifth grades).
- Bruce received a photo and thank you from the Mill Creek Restoration Project for the plant's continued support.
- Rohm and Haas held an all employee meeting on March 1 at Reading High School to announce a cost reduction effort for the plastic additive business. The plant is facing a reduction in work force due to high natural gas prices, an increase in raw material prices, global competition, and the refusal of Lowe's and Home Depot stores to accept price increases from suppliers that sell the plant's products.
- Q: How many plant jobs will be lost?
- A: We aren't sure yet, we should know in early May. We are trying to look at ways to reduce operating costs and avoid job loss.
- Q: Why won't Lowe's and Home Depot store accept price increases from its suppliers?
- A: The big box stores refuse to accept price increases because they will can find another supplier from other countries whose energy costs are lower that ours. We have lost half our business to China and we are trying to compete with their prices.

I recently heard some statistics at a recent Ohio Chemistry Technology Council meeting:

- ➤ Ohio used to be 4th in the country for chemical shipments, and now it's 8th.
- ➤ Chemical-related employment has gone from 65,000 in Ohio to 50,000 in 4 years.
- Average salaries in the chemical manufacturing field are \$50,000 \$70,000 yearly and 15,000 jobs have been lost in Ohio over the last 4 years.

Community Announcements

• Chief Kaiser told the CAC that the Miami Township Fire Department activated the NOAA weather radios on March 20 to issue a Shelter In Place when a 6,000 gallon petroleum tank

caught fire. He said emergency response officials did not activate the outdoor warning sirens. It took 8 minutes to activate the weather radios and 10 minutes for the announcement to be broadcast on 700 WLW. There was discussion among the CAC that Shelter In Place instructions were not given out on the weather radio and there was some misinformation about where the incident occurred.

- Carol Bullock Carpenter announced the City of Reading will participate in the Great American Clean Up on Saturday, April 24. Anyone interested in picking up litter along Galbraith Road should meet at 10 a.m. at Koenig Park. The Reading Fire Department will provide a picnic lunch afterwards.
- The Village of Evendale will host the 3rd Annual Neighbor to Neighbor Getting To Know You Picnic on October 30. All residents of Reading, Evendale, Lockland, Arlington Heights, Amberly Village, Lincoln Heights and Blue Ash are invited. Last year over 500 people attended.
- Suzie Bateman announced the Relay for Life will be held June 11-12. The CAC voted to sponsor a team again this year.
- The Reading Junior/Senior High School Environmental Club is selling hanging flower baskets and flats as a fundraiser, starting March 29. \$13 for baskets or flats. For more information, email Cheyenne Gill at cgill@readingschools.org.

RCRA Site Investigation Presentation by Mark Hemingway, Geomatrix

Please see the attached slides of Mark's presentation.

- Q: What does RCRA stand for?
 A: The Resource Conservation a
- A: The Resource Conservation and Recovery Act. This was one of the first, major sweeping pieces of environmental legislation in our country. It was implemented in the 1970s. It established the framework for defining whether wastes are hazardous or non-hazardous. It changed the way American industries began managing their wastes. The Clean Air Act basically came out of RCRA.
- Q: Do European and other foreign countries face similar environmental laws?
- A: Typically no. This is one of the reasons manufactured goods from foreign countries are less expensive than what is produced in the U.S. The financial burden of environmental compliance is huge, but the bright side is there is less pollution in this country now than ever before.
- Q: Did the VOC's your firm is investigating come from exhausted air emissions?
- A: No. They most likely came from wastewater or the old sludge ponds.
- Q: What concentrations of contaminants are you seeing?
- A: Typically we're looking at contaminants in the parts per billion level.
- Q: Have other companies along the Mill Creek sampled the creek water? If so, did they find contaminants?
- A: Yes. Many companies have sampled the creek before and found industrial urban contaminants such as pesticides, dichlorobenzene, toluene, etc.
- Q: Can we get a copy of the investigation results from Rohm and Haas, including Mill Creek sampling data?
- A: All study-related documents are available for review at the public library in Reading. As soon as reports are sent to the U.S.EPA, a copy is filed in the library.

- Q: Are you confident that what you have found here and in the Mill Creek, even along Pristine is safe?
- A: I can only comment on the results of our study of the Rohm and Haas site and what is entering the Mill Creek from this site. The U.S.EPA concludes that all current risks posed by soil and groundwater from this site meet federal standards and the migration of chemicals in the groundwater are under control.

I cannot comment on Pristine and any impacts they have had on the soil and groundwater at their site or entering the Mill Creek from that site. Pristine is under its own federal cleanup program because the U.S.EPA found they were causing unacceptable human risks. That's why they are operating a 500 gallon-per-minute groundwater pump and treat system.

- Q: Your findings seem like good news and then we hear about Pristine, why don't they have a CAC?
- A: Because Rohm and Haas is willing to talk with us. When we started the CAC, the neighborhood issues with this plant were odors, air emissions and trucks.

Pristine is a Superfund site; it is no longer an operating facility. Pristine improperly managed huge amounts of hazardous waste in the past and contaminated our area groundwater. That's the reason the City of Reading provides our water now. The people paying for that cleanup are the companies that sent waste there (P&G, General Electric and Formica), not the company that ran the facility.

- Q: How long has the Pristine site been a public issue?
- A: They had a public meeting as long as 10 years ago, but many people never knew about Pristine or what they did.
- Q: How much is this RCRA investigation costing Rohm and Haas?
- A: To date, Rohm and Haas has probably spent \$1.5 million and of that, about \$600,000 was for lab work.
- Q: Do you think other companies are cleaning up their mess?
- A: The regulations that Rohm and Haas is responding to certainly apply to other businesses, but sometimes in different ways. Many of them are subject to RCRA just like Rohm and Haas. It has gotten harder to discharge wastewater into the creek.
- Q: Do you have any reports about the longevity of these chemicals and how they affect our bodies?
- A: No. There is a whole science dedicated to human risk called toxicology. It's pretty difficult to understand the jargon though. Risk assessments are often based on acute exposure, not long-term, low level exposure. You might want to do a Google search for the health affects of the chemicals you are curious about.

NEXT MEETING: 6-7:30 p.m., Thursday, April 22

The meeting adjourned at 7:40 p.m.



Morton International, Inc. Reading, Ohio

ROHM人

Speaker's Introduction

Mark P. Hemingway

- · Project Manager for Reading Investigation
- Principal Hydrogeologist for Geomatrix Consultants
- 18 Years of Experience in Investigations

ROHM

Purpose of Presentation

Discuss

- Investigation:
 - · Objectives
 - Scope
 - Findings
- Current Activities
- What's Next

ROHM

Why Are We Immestigating?

- An USEPA review ID'd 4 areas with "moderate to high potential" for causing contamination.
 - · Old ponds, swale area, drum storage area, facility sewer
- EPA also identified 3 former waste storage areas (above-ground tanks) that require closure certification.
- · Morton voluntarily identified 7 areas of reported historical (pre-1980) waste burial.

ROHM

What did it take to answer those questions?

- Searches for buried waste materials
- Characterization of shallow groundwater system (nature of flow)
- Sampling of groundwater and soils
- · Inspection & sampling of Mill Creek
- · Evaluation of sewer system
- · Understanding of background

ROHM

RCRA Facility Investigation

- Started with Work Plans in 2000
- · USEPA Approved Work Plans, Rohm & Haas performed work through much of 2001
- Report to USEPA in Summer 2002 with findings.
- · EPA Comments in 2003, Prepared Plan for Addt'l Sampling
- Sampling Now, With Report Done This Summer

ROHM A



So Where Are We?

We Now Have a Detailed Understanding of:

- Complex Site Geology
- Groundwater Occurrence &
 Movement
- The Presence of Chemicals in Soils & Groundwater

ROHM I



Extent of Groundwater Impact - Upper Aquifer

- · Shallow Impact from VOCs
- Primary Morton Constituents are Acetone, Toluene, Chlorobenzenes Chloroethanes (TCA), Tin
- Primary Pristine Constituents seen on Morton Facility are Chloroethenes (DCE, vinyl chloride), Metals, Pesticides

ROHM A





Extent of Groundwater Impact - Upper Aquifer

- Primarily in Northern and Central Areas of Facility
- Does Not Extend to the South (i.e., toward nearest residential)
- Extends West Beyond French Drain, Apparently Reaching Creek

ROHM



Mill Creek

- Area-Wide Impact to Mill Creek Present From a Large Number of Sources
- Sediment & Seep Samples Show Low Levels of Arsenic, Tin, Dichlorobenzenes, Acetone Near the Plant
- May be Coming from Shallow Groundwater Getting Past the French Drain

ROHM





Other Major Findings

- Possible Morton Chemicals Are Restricted to Shallow Groundwater
- French Drain Can Sustain More Aggressive Pumping
- Sewer Requires Rehabilitation Work (Especially Older Sections)
- Background Soils Contain Metals, Pesticides, and other Chemicals

ROHM



What's Being Done Now?

- Major Sewer Capital Improvement Project, Multi-Year
- Soil Excavation in West Plant Area to Remove a Small Area of Buried Waste
- · French Drain Upgrades

ROHM A



USEPA Environmental Indicators

- · Summary of their Understanding of Current Environmental Conditions
- . They Conclude That:
 - · All Current Risks Posed by Chemicals in Soils & Groundwater are Below Federal Standards
 - · Migration of Chemicals in Groundwater is Under Control

ROHM A



What Now?

- USEPA has requested additional sampling to close data gaps in some areas (all previously investigated).
- · Work is currently being done (March 2004) to provide that data
 - Soil sampling and test borings
 - . Two additional wells
 - · Creek water & sediment sampling
 - Groundwater sampling
- · Completion of new Field Work by April 2004

ROHM



And Then?

- We Analyze the New Samples
- Review the New Data
- Report Overall Findings to USEPA, Summer 2004
- USEPA Review, Time??
- Complete Risk Assessment and Implement Any Required **Additional Remedy**

ROHM

Will He Ever Stop Talking?

- · Extensive environmental investigations have now been completed by Rohm & Haas
- · Remedy actions to address suspected sources are in progress
- Updated Investigation Report to be submitted to the USEPA in Summer of 2004
- Risks from Chemicals in Soil & Groundwater Continue to Appear Low, Pending Remainder of Work

ROHM



AGENDA November 13, 2003 6:00 p.m. — 8:00 p.m.

Sign-In and Introductions All
Dinner All

Plant Update Bruce Beiser

Community Issues Update All Announcements All

Dept. of Transportation Security Regs. Bruce Beiser Preparation of 2003 CAC Evaluation Bethany Dale

Remember — The CAC does not meet in December. Happy Holidays, see you next year!



November 13, 2003 Meeting Minutes

Members Present

Suzie Bateman
Bruce Beiser
Bill Ford
Cheyenne Gill
Rick Gordon
Chief Kevin Kaiser
Curt Lambert
Barb Stall
Margie Stall

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and reviewed the agenda. Dinner followed.

Plant Update (Bruce Beiser)

Safety

No OSHA recordable injuries since last meeting.

• There was one first aid injury to a chemical operator for a first-degree thermal burn to his forearm.

Environment

Sewer

• There were no wastewater permit exceedances or reportable spills.

At the last meeting, Bruce reported that the plant had requested a formal hearing regarding the last two Notices of Violation received from MSD in August and September, which were based on sampling from Feb/early March. The plant had also received a penalty notice from MSD for \$14,700, but is contesting it due to MSD's delay in reporting, analysis and investigation.

Since then, the plant has had an informal meeting with MSD to communicate its concerns with the violations. (i.e., MSD regulations state they must report violations within 90 days of occurrence, but they didn't notify Rohm and Haas until 145 days later.) MSD acknowledged the plant's concerns and is taking them into consideration for further action.

Air

• There were no air releases or permit exceedances to report.

RCRA Site Investigation

• A meeting was held on site with the U.S. EPA and its contractor, Ohio EPA, U.S. Geologic Service, and Geomatrix, the plant's contractor. All parties toured areas of concern and discussed the issues outstanding. The plant received a better idea of the U.S. EPA's expectations. Progress was made in moving the revised work plan forward. The plant will install 24 groundwater monitoring wells near the truck unloading area starting in February.

Odor Complaints

• The plant received one odor complaint (mercaptan) since the last meeting. The complaint was called in on October 23 at 9:00 p.m. by the Reading Fire Department, who received the complaint from a Rohm and Haas guard.

• The plant continues to use biological treatment on its odor control scrubber.

• The plant is looking at another technology using reactive fragrant oils for sewer odor.

Odor Reduction Project

• Project funds have been approved, and purchase orders for the blowers and construction have been issued. Estimated completion date is end of March 2004.

Methyl Chloride Emission Reduction Project

• Request for capital funds will be submitted this month. This was supposed to be done last month, but there was a delay due to Ingersoll-Rand providing information on the compressor upgrade.

 Detailed design continues on the gas driers, emission control valves, control loop logic, and mass flow meters.

• Since this project started nine months ago, the plant has reduced its methyl chloride emissions by 13 tons compared to the same nine months in 2002. The year to date total for 2003 is 27 tons. The plant is pleased to see this much progress already considering the project isn't complete yet.

Early Truck Arrivals

• There were no early trucks in the past 4 weeks.

Plant Security Upgrades

- Work is underway and visibly obvious, especially for the new road and gate for the employee entrance.
- The permanent guard shack outside the plant gate has been built.

Poles, lights and cameras are being installed.

* All work is scheduled for completion by the end of December.

Plant Community Relations Update

- The plant donated a "Decontamination Shower Unit" to the Reading Fire Dept in appreciation for their assistance with its emergency preparedness training and planning.
- The plant sponsored 3 teachers to the Teachers In Education Conference at Miami University. They were:
 - Bonnie Sirk, Reading Jr/Sr High School
 - Robert Hayes, Hilltop Elementary

- Marsha Wilderspin ,Central Elementary

• The plant held its annual Veteran's Day celebration to honor employees who served in the armed forces. One of the plant's chemical operators is working with another agency

in town in an effort to send 1,000 care packages by Christmas to U.S. soldiers presently serving in Iraq.

Community Update/Announcements/Questions

- The plant received a noise complaint from the community. The plant investigated it and determined the noise was coming from a piece of equipment with a loud exhaust fan. Corrective action was taken by building a muffler on the equipment.
- 60 Minutes will be broadcasting a segment on security at chemical facilities on Sunday, November 16 at 7 p.m.
- Chief Kaiser said that Central School has almost completed its Shelter In Place plan. On December 4 at 3 p.m., several Reading firefighters and members of Reading's Junior/Senior High School Environmental Club will be getting together to assemble the Shelter in Place kits for that school, which will fully complete their plan. The Fire Department will work with the high school on their plan next. Sts. Peter and Paul recently had a drill for their school's plan.
- Q: Have you ever had a noise complaint before?
- A: Yes. We had one this past summer.
- Q: How many Shelter In Place buckets will you be putting together for Reading Central?

A: We'll need 10.

Security Regulations Presentation (Bruce Beiser)

Bruce used his laptop computer to demonstrate the plant's computer-based-training module for plant security regulations and new Department of Transportation regulations. Because of the videos included in the module and the computerized exercise itself, the plant is unable to print off a copy for inclusion in the meeting minutes. (If anyone would like to see the security regulation/training program, please call Bethany and a special meeting can be arranged.)

Security, as defined in the presentation, includes physical plant security, transportation, and information technology. Below is a brief outline of Bruce's presentation.

The computer training objectives:

- Why security is necessary
- Rohm and Haas' security plan as a company
- The Cincinnati plant's security plan
- New Department of Transportation security regulations

Part 1:

- Awareness of security issues
 - There are 800,000 hazardous material shipments in the U.S. each day
 - Hazardous materials are most vulnerable when in transportation

Part 2:

- Security improvements
 - Background checks
 - Employee ID cards
 - Seals and locks on tankers and rail cars
 - Restricted access to hazmat areas
 - Tamper-proof packaging
 - Pre-notification and confirmation of shipments

- Inspection of new shipments
- Written site security plan and updates that satisfy the U.S. Dept. of Transportation, U.S. Coast Guard, U.S. Customs and American Chemistry Council

Part 3:

- Response to security threats
 - 4 different security levels and related policies and procedures

Part 4:

Role of the employee

Part 5:

• Role of distribution providers (mainly a corporate function)

Preparation of 2003 CAC Evaluation

Bethany distributed copies of the 2002 CAC evaluation for member's to review and decide if they wanted to add any new questions to the 2003 evaluation. Everyone agreed that if we updated the topics covered in 2003 and the number of members, the evaluation is still measuring the right criteria. Bethany will email the evaluation to members not present at tonight's meeting to give them an opportunity to make suggestions or changes. Bethany encouraged everyone to complete the evaluations, which will be mailed out after Thanksgiving.

REMEMBER: There is no December meeting.

The meeting adjourned at 8:00 p.m.



October 22, 2003

Bethany Dale ETC 31 Triangle Park Drive Cincinnati, OH 45246

RE: Summa Canister in Evendale

Dear Bethany:

Hamilton County Department of Environmental Services would like to notify you and the Community Advisory Council that the Reading air toxics monitor is currently in operation at the Cincinnati State Facility on Reading Road.

This data from this canister is available after the end of each year after Ohio EPA has quality assured and quality controlled the data. The data is usually received at the Hamilton County Department of Environmental Services in April of each year. Once we receive a copy of this data, if the CAC is interested, a copy can be shared with the community at that time.

If you have any questions about the relocation or operation of the monitor, please feel free to contact me at 513-946-7738. Thank you for your continued interest in the environment.

Sincerenly,

Kerri Castlen

Permits & Enforcement Area Supervisor

Homi Costan





AGENDA October 9, 2003 6:00 p.m. — 8:00 p.m.

Sign-In and Introductions

All

Dinner

All

Plant Update

Bruce Beiser

Community Issues Update

All

Announcements

All

Odor Reduction Project Update

Curt Lambert

The next CAC meeting will be Thursday, November 13. Scheduled topics are Emergency Response Systems and Preparation of the 2003 CAC Evaluation.



AGENDA August 14, 2003 6:00 p.m. — 8:00 p.m.

Sign-In All Introductions All Dinner All Plant Update Bruce Beiser Community Issues Update Neighbors Announcements All 2002 Toxic Release Inventory Data Curt Lambert Plant Security Doug Burdick September Meeting (social outing) Bethany Dale



August 14, 2003 Meeting Minutes

Members Present

Suzie Bateman
Bruce Beiser
Rachael Belz
Bill Ford
Cheyenne Gill
Jon Hopkins
Chief Kevin Kaiser
Curt Lambert
Dave Lehrter
Mayor Earl Schmidt
Sabrina Smith
Barb Stall
Margie Stall

Visitors Present

Doug Burdick (R&H Cincinnati Facility Project Engineer)
Robin Cole (R&H Cincinnati Facility EHS Manager)
Mike Fitzpatrick (Rohm and Haas President and COO)
Rick Gordon (Electric Motor Technologies)
Sister Joan Krimm (Mt. Notre Dame Convent)
Matt Schneider (Girindus America, Inc.)
Terry Zimmerman (Reading Police Dept.)

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and reviewed the agenda. Members and visitors introduced themselves. Bruce made a special introduction of Mike Fitzpatrick, President and COO of Rohm and Haas. Dinner followed.

Plant Update for July and August (Bruce Beiser)

• The plant's first OSHA recordable injury of the year occurred in July when a production operator strained a ligament in his finger while clearing a blocked line. This ended the 240-day streak since the last recordable injury.

Environment

Sewer

• There were no wastewater permit exceedances or reportable spills.

• The plant received a Notice of Violation on 8/07/03 from the Metropolitan Sewer District. It was for a toluene permit exceedance that was noticed during sampling done on the south sewer between 2/28 and 3/03. The plant is conducting an extensive investigation to determine the source. The last toluene exceedance was in 1996. Toluene is kept under lock and key in the laboratory and must be signed out when used. Nobody has signed it out in 1 1/2 years.

Q: What is toluene?

A: Toluene is a solvent, commonly used in paint thinner.

Air

• There were no air releases or permit exceedances to report.

RCRA Site Investigation

• The plant is undergoing a site investigation, under order from the U.S. EPA, to determine if historical plant operations have led to off-site impacts. The initial site investigation report was submitted to the U.S. EPA in 2002, but the agency requested that additional work be conducted. The plant submitted a new work plan to the U.S. EPA in May 2003 and is currently waiting on a response back from the agency.

Odor Complaints

• The plant received three odor complaints since the last meeting, all from different complaintants.

3 complaints rotten egg odor
1 complaint solvent odor

Odor Reduction Project

• The plant continues to use biological treatment on its odor control scrubber. As of May 22, the plant resumed discharging its odor control scrubber solution directly to the sewer system with approval from the Metropolitan Sewer District. Engineers are evaluating whether the biologically treated scrubber solution improves odors in the sewer.

• Capitol Project — The design of this project is in its final stage. The contractor is ordering ductwork to be done on the building stack in September and October. Project engineering is

ordering the ventilation fans.

• Modeling for these projects predicts a 2/3 reduction in odors from the Building 3 complex at the plant's fence line. The modeling suggests that this improvement should put community concentrations below odor detection levels. (Post-meeting note: It is important to remember that odors from sewers, Mill Creek, and other natural sources add to community odors.)

Q: What does the odor reduction project involve exactly?

A: Installing a new, 40 ft. high velocity exhaust stack, which will disperse odors from building 3/3A into the air at 4,000 feet per minute.

Methyl Chloride Emission Reduction Project

• News seals were installed on one compressor train. Initially, the improvement in recovery efficiency was 17% (i.e., it raised the recovery efficiency from about 88% to about 90%). Additional work was done and an air leak on the stripper column was detected and fixed, bringing the recovery efficiency of the system up to about 95%. If the system continues to operate with 95% recovery efficiency, it would reduce emissions by about 20-30 tons per year, (i.e., from about 45 tons per year at 88% efficiency, to about 20 tons per year at 95% efficiency). The target is to get this system to recover 98% of methyl chloride emissions and get below 10 tons/year. So far, the improvement is encouraging.

Q: A few months ago we heard about this whole project and the CDP process. What stage is that process in now?

A: Gate 3, which is where the project funds get requested. The first phase of that gate is "end of life replacement projects." This involves upgrading the seals, replacing the dryer and installing insulation on tanks and lines.

Q: Are you still on schedule for the whole project?

A: We are still planning to get phase one done this year.

- 5 trucks arrived early (prior to 7 a.m.) since the June 12 meeting. Three were first-time offenders. The earliest truck arrived at 6:00 a.m. Bruce said he is still working on the issue with all plant suppliers. He passed the truck log around.
- Q: According to the truck log, this was a significant improvement over this same time last year.
- A: There was a spike in trucks last August because one of our suppliers, who usually ships in railcars, had to start shipping to us via trucks when a railroad bridge was inactive. It takes 4 trucks to bring what 1 railcar can carry.

Plant Community Relations Update

• Relay For Life — the CAC sponsored a team for June's event and won the fund-raiser of the evening award for selling hamburgers. Rohm and Haas also donated \$1,000 to the event as a corporate sponsor. 10 employees participated, 3 of which were cancer survivors.

• The plant hosted two high school students for a day as part of the University of Dayton's Women in Engineering camp.

• Plant kicked off its 2003 United Way campaign. So far, employee commitment is \$33,000.

• Plant is hosting Congressman Steve Chabot on 8/22/03. He is interested in learning more about Reading and Rohm and Haas.

• The plant is interested in providing some of the supplies for the fire department's Shelter In Place buckets for the Reading schools.

Community Update/Announcements/Questions

- Kevin Kaiser told the CAC the Reading Schools are working hard on their Shelter In Place plans. Right now the plan has focused on the Reading Central Elementary School. Kevin passed around a Shelter In Place newsletter that he developed for the schools to mail home to parents. With the CAC members' support, he would like to issue it under the sponsorship/partnership of the CAC. The members agreed this was a good idea. Bethany suggested that members take a copy home and send any comments/edits to Kevin directly.
- Mayor Schmidt explained to members that the city recently decided to disband its local board of health because it felt it could offer more services to the community by joining the Hamilton County General Health District. This is a much larger organization, which provides health services to 43 of the 47 political districts in the county. By doing this, the city will save \$65,000 annually. There will be a public meeting on 8/20 at City Hall at 7 p.m. The Hamilton County General Health District will be present to answer any questions from the public. They will begin conducting immunizations on the second Wednesday of each month at City Hall for a small fee.
- Q: What does the new health program mean for the school nurse systems?
- A: The public schools have always had their own nurse. The parochial schools will have to hire their own nurse now.

2002 Toxic Release Inventory Presentation (Curt Lambert)

Please see attached slides as a summary of Curt's presentation.

- Q: You reported that the plant released 46.5 tons of methyl chloride to the air in 2002. Is it the air emissions you are trying to reduce to 10 tons/year as part of the methyl chloride emissions reduction project?
- A: Yes. Our target is to get emissions below 10 tons/year.
- Q: When are you required to get below the 10 tons/year of methyl chloride?

- A: Our permit right now does not require us to get under 10 tons/year. If we have the potential to emit less than 10 tons per year, we will be designated as a "minor source." We want to get below 10 tons/year, since "minor sources" are treated differently from "major sources" under Title V of the Clean Air Act. In August 2006, "major sources" will be required by the U.S. EPA to control emissions to 98%. Knowing that this standard is coming, the plant has set a target to get the system's recovery efficiency up to about 99% and emit less than 10 tons per year, and be designated as a "minor source" well before that date.
- Q: How did the lead emission levels go down 29.1% even though the amount processed went up by 20.3%?

A: The plant started using a higher grade of tin, which has less lead content.

Comment:

In 2002, the methyl chloride emissions went up 30% even though the amount processed only went up 13.6%. The emissions recovery system did not operate as efficiently as it did the year before (87.8% in 2002 compared to 86.3% in 2001). After the accidental release in November 2001, the plant had significant equipment problems. We ran at a lower efficiency for a long time before everything was fixed properly.

Q: Was that the situation where the operators tried to hide the release?

A: Yes. We noticed unusual data coming out of the system and found out later that the operators did not report the release. This incident resulted in their termination.

Cincinnati Facility Security Project Presentation (Doug Burdick)

Please see attached slides as a summary of Doug's presentation.

Q: How are you going to modify the fence near the walking trail?

A: It is about 6 feet high now. We are going to add 2 more feet to the height.

Q: Will the new plant entrance be for employees only?

A: Yes. We are branching left off the existing plant entrance and taking the employee entrance right into the employee parking lot.

Q: Will the motion detection lights come on in a strong wind?

A: They are programmable and can be set so that weather doesn't trigger the lights all the time. It will take some trial and error to get them adjusted properly.

Q: Do you have any problems with kids back in the walking trail area?

A: We haven't had any problems there in awhile. One time, kids shot out the lights.

Q: When will the project begin?

A: Construction will start in September. We hope to finish the project this year.

Q: What kind of light bulbs will you be using on the fence lights?

A: Quartz lights around the south by building 40. High pressure sodium around the rest of the perimeter.

Comment:

Margie Stall commented at how much has been accomplished since the CAC started. The improvements are noticeable.

September Meeting Discussion (Bethany Dale)

Bethany reminded everyone that the September 11 CAC meeting is the scheduled off-site social outing/meeting. Last year, members went on a B&B Riverboat dinner cruise. We had a speaker from Thomas More College who talked about the ecological history of the Ohio River.

Bethany asked members what they would like to do this year. She offered the riverboat trip again, and other possible events like the Cincinnati Zoo or the Cincinnati Museum Center. Members expressed that they would like to go on the riverboat trip again. Rachael suggested that we try to get a speaker from the Tall Stacks organization since Tall Stacks is coming to town again this fall. All members and tonight's visitors are invited to go on the riverboat trip. Everyone is also welcome to bring a guest.

Closing Comments (Mike Fitzpatrick)

Mike thanked everyone for attending the CAC meetings and for helping the plant be a better citizen in the community. Rohm and Haas believes that the plant's operation is a privilege granted by the community, one that can be taken away. He expressed the company's commitment to the community in working on the issues expressed by CAC members – particularly odor abatement, emergency response, site security and air quality. Long-term, the company is working towards zero emissions to the environment. Mike also told members that the plant's \$1.4 million request for the security project was sitting on his desk in Philadelphia and he planned to sign it as soon as he got back to his office. He thanked the members for allowing him to sit in on tonight's meeting.

The meeting adjourned at 8:10 p.m.



AGENDA June 12, 2003 6:00 p.m. — 8:00 p.m.

11
11
ruce Beiser
eighbors
11
ethany Dale
uzie Bateman
hief Kaiser

The next CAC meeting is August 14
Topic is 2002 Toxic Release Inventory Data



June 12, 2003 Meeting Minutes

Members Present

Bruce Beiser
Suzie Bateman
Carol Bullock Carpenter
Bill Ford
Jon Hopkins
Kevin Kaiser
Margie Lehrter
Sabrina Smith
Barb Stall
Margie Stall

Visitors Present

Dan Milz (Principal, Reading Junior/Senior High) Al Schuster (Reading resident) Becky Turner (attending for Curt Lambert)

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and reviewed the agenda. Introductions and dinner followed.

Plant Update (Bruce Beiser)

Safety

• The plant continues the year without any OSHA recordable injuries. It has been over 200 days since the last recordable injury.

Environment

Sewer

- There were no wastewater permit exceedances or reportable spills.
- Q: Is the plant sewer system a combined sewer?
- A: Yes. We have two discharges one goes out on the south side of the plant and goes down Bernard Street and the other one is on the northwest side of the plant and flows toward the Mill Creek to the main trunk line.
- Q: What type of on-site wastewater treatment do you have, if any?
- A: The plant operates an oil and grease separator and a system for pH control.

Air

• The plant had a 40-60 lb methyl chloride release on June 5 when a thermal pressure relief valve on a transfer line opened up. An investigation showed that liquid methyl chloride was left in the line when the line was closed. When the temperature changed from 60-80 degrees overnight,

Q: Does the plant ever give neighborhood tours?

A: Yes. The plant offers community tours/open house every 5 years. The next one will be held in 2005. In addition, the CAC is offered a plant tour once a year.

Community Update/Announcements/Questions

- Bruce offered a plant fact sheet, history brochure and corporate annual report to any visitors who wanted one.
- Kevin Kaiser told the CAC the Reading Schools are working on their crisis plans. Right now the plan has focused on the Reading Central Elementary School and the school is updating its plan for Shelter In Place. Kevin showed members an example Shelter In Place bucket that is being prepared for all of the schools. All Shelter In Place plans and buckets (kits) should be ready for the public and parochial schools when school starts again. Each bucket will cost about \$20. The fire department will probably need 25 kits for the public schools and will be looking for some financial assistance to purchase supplies.
- Q: Will there be a Shelter In Place bucket or kit in each classroom?
- A: No. Our idea is to cluster students into common areas like the media centers or multiple classrooms.
- Q: What about Shelter In Place for the Lighthouse Point residents since they are a vulnerable population?
- A: That facility is under new ownership/management and they are interested in Shelter In Place. Positive changes are happening there and we hope to help them with contingency plans and a Shelter In Place program.

CAC Recruiting Update (Bethany Dale)

- Informational letters were sent to approximately 320 residents, businesses, schools and other organizations.
- Thanks to the letters, we have two new visitors tonight and several more who contacted
 me and expressed interest in attending the August meeting. They were representatives
 from Mt. Notre Dame School, Mt. Notre Dame Convent, Lighthouse Point Healthcare
 and Electric Motor Technologies.
- A few members suggested we contact someone at UC's Bioresearch Facility on Reading Rd., Patheon and Girindus.

Relay For Life Update (Suzie Bateman)

Relay For Life is Friday, June 13.

So far, the CAC team has raised \$2,400.

- Three plant employees are cancer survivors and will be walking during the Survivors Lap at 6 p.m. and will be invited to the dinner afterwards.
- The CAC team theme is The Flintstones.

There is plenty of room for more walkers.

• The event will be lots of fun and there will be food and entertainment.

Emergency Response Notification Presentation (Chief Kevin Kaiser)

Please see attached slides as a summary of Kevin's presentation.

Other Points

Declaration of Incident

Level 1 — Reading Fire Department on standby; incident stays on site

Level 2 — More serious incident; incident moves off site; may call other agencies for backup

Level 3 — More resources; awareness is peaked; may get into disaster situation

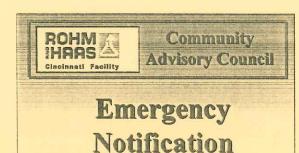
Comment: Hamilton County can now use the NOAA weather radios to give specific instructions about an incident including evacuation or Shelter In Place procedures to take. The incident has to be a level 2 or 3 to activate the alert system. Usually the weather radios would be used in combination with the outdoor civil defense sirens. If you hear the sirens, you should immediately go to your TV or radio for more information. The Reading Fire Department has the responsibility for community notification. The life issues are our top priority. We give away the NOAA weather radios at community events to help educate them about emergency response notification methods.

Comment: Rohm and Haas should come up with some kind of plan to help us, the neighbors, feel safer about living near the plant. Marilyn Wall has researched lots of different notification methods and maybe she can talk to us about her research. We just want to be proactive. It is a fear of the unknown.

Comment: The plant does not want to install a separate siren system because that causes too much confusion. It is the responsibility of the fire department to notify residents. The plant does support communication efforts in helping to educate the community about the weather radios. The plant should also communicate all of the safeguards and procedures it has in place to reduce the risk of a serious incident.

Comment: During plant safety meetings sometimes, maybe you could talk to the safety team about the Bernard fence line and brainstorm some emergency response notification procedures.

The meeting adjourned at 8:10 p.m.





The Planning Process

¥ Research

- —Review case studies, plans, mutual aid agreements and guidance.
- -Conduct hazard/ risk analysis.
- -Determine resources.



The Planning Process

¥ Research

- -Review case studies, plans, mutual aid agreements and guidance.
- -Conduct hazard/ risk analysis.
- -Determine resources.



Evacuation

- ¥ Incident Management
- ¥ Disaster Management



Evacuation



- ¥ Spontaneous Evacuation
- ¥ Voluntary Evacuation
- ¥ Mandatory/Directed Evacuation



Pre-Evacuation Decisions

¥ SHELTER-IN-PLACE

- ¥ Incident is likely to be resolved in a short period of time or the toxic hazard is an acute hazard rapidly passing;
- ¥ The citizens might be exposed to the material more severely by leaving their homes to evacuate.
- ¥ Notification/ Use of Emergency Alerting System.

***Remain indoors, close windows and doors, shut off furnace/air conditioners/fans, and avoid going outdoors until an all clear message is issued.



Pre-Evacuation Decisions

¥ Evacuation

- * Determine the boundaries of the evacuation zone.
- ¥ Determine the Crisis Relocation Collection Points (CRCPs) to be used by evacuees.
- ¥ Determine routes evacuees should use to reach the CRCPs.
- ¥ Notification to local Emergency Management Agency and the Hamilton County Communications Center for alerting of the Emergency Alerting System



Notification

- ¥ Door-to-door notification
- ¥ Vehicle public address systems
- ¥ Telephone
- ¥ Media
- ¥ Civil Defense sirens (media instructions)
- ¥ Weather radio alerting (media instructions)





AGENDA April 10, 2003 6:00 p.m. — 8:00 p.m.

Sign-In All Introductions All Dinner All

Plant Update Bruce Beiser Community Issues Update Neighbors

Announcements All

Relay For Life Update Suzie Bateman

Neighborhood Smoke Detector Blitz

Increasing CAC Membership All
Shelter In Place Booth Sponsorships All

The next CAC meeting

May 8

<u>Topic</u>

Plant Tour

Presentation from Reading Junior/Senior High School Environmental Club



AGENDA March 13, 2003 6:00 p.m. — 8:00 p.m.

Sign-In
Introductions
Dinner
Plant Update
Community Issues Update
Announcements

Down The Drain Tour Sign Up

Relay For Life Sign Up

Methyl Chloride Emission Reduction Project

All All

All

Bruce Beiser

Neighbors

All

Linda Stichtenoth Suzie Bateman Matt DeMaison

The next CAC meeting
April 10

Topic
Shelter In Place Booth Sponsorships
Increasing CAC Membership



March 13, 2003 Meeting Minutes

Members Present

Suzie Bateman Bruce Beiser Rachael Belz Bill Ford Chief Kevin Kaiser Curt Lambert Jim Pfennig Sabrina Smith Barb Stall Margie Stall

Visitors Present Matthew DeMaison - Speaker, Rohm and Haas Process Engineer Marti Sinclair — Sierra Club

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and reviewed the agenda. CAC members and visitors introduced themselves. Dinner followed.

Plant Update (Bruce Beiser) Safety

There were no new OSHA recordable injuries to report since the last meeting. However, one of the first aid injuries mentioned at February meeting (chemist burned his wrist) later became a recordable injury when additional medical treatment was required.

On March 10, the railroad was switching railcars and derailed an empty methyl chloride railcar by running it into a chlorine car, moving it 8 feet. The emergency devices/shutoff valves worked properly and there was no release or injury.

Q: Did you have to bring an emergency team in to check everything?

A: No. We probably should have called the Reading Fire Department, but didn't because there was no release or injury. After the impact the only task was for the railroad to realign the cars on the tracks. The plant will be conducting a root cause analysis of the incident. The railroad will participate in that study. The plant probably should have called its own emergency response team to the scene.

Comments:

The chlorine railcars are incredibly strong and designed with 1-inch thick steel. They also have built in safety plates.

Q: Has that ever happened before?

- A: We have had engine derailments before. I think the railroad company has had it happen before because they reacted very quickly and everything was back together within a couple of hours. It was the local I&O Railroad that was handling the switching of the railcars.
- Q: What time did that happen?

A: 5:07 p.m.

Q: Do you usually get railcar shipments at that time of day?

A: No, the railroad was late that day and our receiver stayed late to accept the railcar.

Comments:

The plant has a video camera that monitors the tops of the railcars so any visible leak can be seen from the control room. The tape will be useful when we conduct the root cause analysis.

Environment

Sewer

• There were no wastewater permit exceedances to report.

• The plant had a 25-gallon spill to the sewer from the oil and grease separator and subsequently notified the Metropolitan Sewer District (MSD).

• The plant just received a Notice of Fines of \$18,000 from MSD for the chloroform that was detected in the sewer last October.

Air

• There were no air permit violations to report.

• The plant submitted comments on its draft Title V air permit.

RCRA Site Investigation

- The U.S. EPA is now asking the plant to install additional monitoring wells and take more soil samples based on new agency guidance. This means the previous site investigation and final report must be reworked to meet new screening and analysis requirements. During the 2001 site investigation, Rohm and Haas did not find any hot spots of contamination. The contamination that was detected was consistent with the contamination from the adjacent Pristine site. It will probably be another 12-18 months before the RCRA Site Investigation report is final again.
- The U.S. EPA determined that the plant's French Drain water collection system is sufficient.

Odor Reduction

• One odor complaint (rotten egg) was called in at 9:07 p.m. on 3/10/03.

- The plant is splitting the odor reduction project into two phases so it can move forward with the part that is already defined.
 - <u>Phase I</u> Install point source odor controls on the reactors and manways and put in general building ventilation and exhaust stack. The plant is moving forward with the engineering/estimating so it can submit the capital request.
 - <u>Phase II</u> The plant will continue to work on refining the filter ventilation and any scrubber modifications.

Methyl Chloride Emission Reduction

• Matt DeMaison will present the history and status of this project tonight.

Early Truck Arrivals

- Six trucks arrived early since the last meeting (4 weeks ago).
- Arrival times were 2:45 am, 6:00 am, 6:30 am, 6:40 am, 6:45 am and 6:50 am.
- The plant is still working on the issue. Bruce passed around the truck log.
- Q: Are any of the very early arrivals repeat offenders?
- A: The truck that came at 2:45 was Kutsman Trucking. They came early once before at 6:00 am in December 2001.
- Q: Are the early arrivals due to bad weather?
- A: Yes, we saw some of that this winter. The problems are mostly caused by the trucks wanting to arrive a few minutes early to be the first one in the gate.

Community Relations

• The plant celebrated Black History Month in February with onsite activities held on 2/28. As part of the celebration, the plant sponsored an essay contest with 12 winners total from both Reading elementary schools and two Woodlawn elementary schools. The winners received \$100 gift certificates to Best Buy and the classroom teacher of the winning students received \$150 gift certificate for school supplies.

Community Update/Announcements

- Chief Kaiser and Jim Pfennig told the CAC about Reading's grant application under the U.S. EPA's Brownfields program to conduct a Phase I-II environmental site assessment on the former Nivision property (Reading Rd. and Third St.) So far Reading is 1 of 900 national locations picked so far to apply for the grant, but the city needs support from the community to submit with its grant application. Reading would ultimately like to have the property cleaned up so that a new library can be built there. The CAC agreed to submit a letter showing its support of the grant application. Chief Kaiser said the letter was needed as soon as possible. (POST MEETING MINUTE: Bethany drafted the letter and delivered it to the City of Reading on March 14.)
- Q: What is the problem on that property?
- A: The City doesn't know yet, that's what the Phase I-II site assessments will show. There are probably petroleum by-products in the soil there.
- Q: What exactly are you asking for in the grant application?
- A: The grant application strictly seeks money to conduct Phase I-II site investigations.
- Q: What are the health risks of the site as it is right now?
- A: The City can't really answer that question yet because it doesn't know what may be in the ground there. A few environmental investigations have been conducted in the past but the results were not consistent.
- Bethany passed around a sign-up sheet for the "Down the Drain" tour of the Metropolitan Sewer District's Mill Creek Wastewater Treatment Plant. The tour is Saturday, April 5, from 9:00 am-noon. Rohm and Haas will pay for the tour; provide transportation and a lunch for any CAC members or members of the Junior/Senior High School's Environmental Club who want to go.
- Suzie Bateman gave the CAC an update about the American Cancer Society's Relay For Life, which will be held from 6:00 p.m. Friday, June 13 to noon on Saturday, June 14 at Reading Memorial Stadium. Suzie is the team captain and she needs 10 participants to register a team. Each team will have a tent set up and team members must walk in shifts during the relay. There

is a \$1,000 registration fee and she asked the plant if they would sponsor all or part of the team. Team members should also try to raise money on their own. The Relay For Life theme is "Going To The Movies" and Suzie picked the CAC's team to be "Grease." She will have another update at the next meeting.

Methyl Chloride Emissions Reduction Project Update Presentation

Speaker - Matt DeMaison, Rohm and Haas Cincinnati plant Process Engineer

Please refer to the enclosed copy of Matt's power point presentation as a presentation summary.

Questions, Answers, Comments about the Presentation

- Q: Is the Capital Deployment Process a Rohm and Haas program? Did Morton ever use it?
- A: This particular Capital Deployment Program is a Rohm and Haas Program. Morton never used anything like this.

Comment: The goal of the emission reduction system is to be 98% efficient.

- Q: What is the efficiency of the current system?
- A: Right now it is 86-89% efficient. Sometimes, we can get to 90% in good weather.
- Q: If you knew how much methyl chloride you were putting into the system and how much you were capturing then is the rest considered a "loss'? Is that loss amount what you reported on your TRI?
- A: Yes. We are conservative and have always overestimated the loss amount on TRI.
- Q: Is getting out of Title V one of your goals for the project?
- A: The goal of this project is to reduce methyl chloride emissions, but getting out of the Title V program is definitely a side benefit.
- Q: Is the difference in the two costs based on final equipment installed?
- A: The difference is actually whether or not the second phase of the project is necessary.
- Q: Since this is about to be handed over to the project engineering department, will you as the process engineer still be involved in the project?
- A: Yes, as technical support.

Comment: The Capital Deployment Process seems to have given us a good path forward. Corporate has approved the budget for this project, so we know it will happen. We were also able to tap into corporate engineering to get their expertise and input on this project.

The meeting adjourned at 8:00 p.m.



AGENDA
February 13, 2003
6:00 p.m. — 8:00 p.m.

Sign-In
Introductions
All
Dinner
All
Plant Update
Community Issues Update
Announcements
All
All
All
Bruce Beiser
Neighbors
All

National Security AdvisoryDown The Drain Tour

Air Toxics Monitor in Reading Citizen Sampling Program

Kerri Castlen, HCDOES Kerri Castlen

The next CAC meeting is March 13 Methyl Chloride Emissions Reduction Project Update



February 13, 2003 Meeting Minutes

Members Present

Suzie Bateman

Bruce Beiser

Carol Bullock-Carpenter

Bill Ford

Cheyenne Gill

Jon Hopkins

Chief Kevin Kaiser

Curt Lambert

Dave Lehrter

Margie Lehrter

Barb Stall

Margie Stall

Nancy Stall

Linda Stichtenoth

Marilyn Wall

Facilitator

Bethany Dale

Visitors Present
Kerri Castlen — Speaker, Hamilton County
Dept. of Environmental Services
George Hettel, Jr.

The meeting was held in the first floor training room at the Rohm and Haas plant. Bethany Dale welcomed everyone and reviewed the agenda. CAC members and visitors introduced themselves. Dinner followed.

Plant Update (Bruce Beiser) Safety

• There were no OSHA recordable injuries to report since the last meeting; however, there were three incidents that required first aid.

Environment

Sewer

- There were no wastewater permit exceedances to report.
- The plant continues to send its odor scrubber waste solution offsite for disposal. This solution had been giving the plant chloroform detections in the sewer.

Air

• There were no air permit violations or exceedances to report.

• The plant received its draft Title V air permit. Revisions need to be made because the Ohio EPA did not incorporate recent plant changes.

RCRA Site Investigation

• Rohm and Haas' corporate staff and the plant's contractor are working with the U.S. EPA to fill in data gaps in the site investigation report. The U.S. EPA is reviewing the data from the French Drain tests.

Odor Reduction

- One odor complaint (rotten egg) was called in at 6:30 p.m. on 1/29/03.
- Plant engineers, corporate engineers and Jacobs Engineering continue to work on the implementation design of the odor control systems. The plant is considering the consolidation of two vent surge tanks to one and the costs associated with that. The plant is looking at the design for the PL filters and manway exhausts. The chloroform issue with the current odor control scrubber is delaying the design phase of the vent tank.

Ventilation Project Update (Curt Lambert)

- The odor control projects involve both general ventilation, in which the air in a building is turned over 6 times an hour, and spot ventilation, which focuses on a particular area.
- There are three types of spot ventilation under consideration
 - 1. PL Filters These vessels are used about an hour each day. Their bottom dishes are opened and solid material drops out of them into a box. The current proposal is to design a series of intake slots to surround the boxes so that any fumes coming off the boxes are drawn into the slots and directed through the building's ventilation system.
 - 2. Manholes These 18-24 inch diameter vessel doors are rarely opened. The current proposal is to design a series of hoses that will be mounted onto the vessels, next to the manholes. When the manholes are opened, any fumes that may escape the manholes are drawn into the hoses and directed through the building's ventilation system. This may not be the best option because the manholes aren't opened very often.
 - 3. **Loading Arms** These piping systems are used to add liquid product into totes and drums for sale to customers. The current proposal is to design an enclosure around the tip of the loading arm and attach a vacuum source to the enclosure. Any fumes that may be present would be contained in the enclosure, not escape into the room. The fumes would then be drawn into the vacuum source connected to the enclosure. This method shows promise.
 - Another option may be to use biological treatment (bugs) to help control odors. Some
 microorganisms display an ability to metabolize sulfur-containing compounds. The plant
 is currently attempting to design a series of lab tests to determine whether the
 microorganisms can be used in its system.
- Q: Where would the plant add the bugs?
- A: Either in the odor control scrubber or in the sewers in the building.
- Q: How many odor complaints did the plant receive in 2002?
- A: In the mid-30s.

Methyl Chloride Emission Reduction

- The emission reduction project will be implemented in two phases. The first involves either a redesign of the current compressor system or the installation of a new system. The cost of Phase I is estimated to be \$1.2 million. If necessary, a second phase will be implemented. This would involve installing a chiller, mechanical refrigeration unit or a cryogenic chiller. The final goal of the project is to reduce methyl chloride emissions to less than 10 tons/year.
- The plant will be getting assistance from two corporate engineers to keep the odor reduction, methyl chloride emissions reduction, and sewer repair projects going.

Early Truck Arrivals

- Bruce reported that four trucks have arrived early since the last meeting (4 weeks ago).
- All four arrived between 6:20 7:00 a.m.
- The plant is still working on the issue. Bruce passed around the truck log.

Q: Do you think you'll ever stop getting early arrivals?

- A: No, but we'll keep working on it. Often times we use a truck broker, who hires independent trucking companies. Sometimes the message about delivery times doesn't get through to the driver, or the driver just ignores it.
- Q: How many trucks come to the plant each day?
- A: Around 18. It fluctuates.
- Q: Do you use Red Express? I have seen them drive up Bernard Avenue.
- A: No, those aren't our trucks.

Site Security and Vulnerability

- The plant is evaluating how to separate the truck entrance from the employee entrance.
- The plant has increased its level of security as a result of the National Security Advisory elevating its level to "orange."
- Rohm and Haas must take additional security measures as part of its site security and vulnerability assessment. This may include installing security cameras and motion sensor lighting at the fence line and increased lighting overall.
- Bethany asked CAC if they feel comfortable meeting at the plant even when security levels are heightened. Members said they feel okay meeting at the plant.
- Chief Kaiser mentioned that the American Red Cross has information available on its website about the security steps you can take at home, at school, or at your office. Some of the educational materials can be loaned out.
- Q: What is level red?
- A: Red is the highest threat level. The best thing to do is look at the American Red Cross' website. The various levels mean different things to different entities. Everyone should be practicing a higher sense of awareness.

Community Update

• There were no additional updates from community members.

Announcements

- Linda Stichtenoth announced that she distributed the February issue of *Formula*, Rohm and Haas' employee newsletter, to CAC members because it had an article about the CAC winning the "Best Communicator Award" from the Alliance for Chemical Safety. This newsletter goes out to 20,000 employees worldwide. (Formula is included as a handout.)
- Linda invited CAC members to attend "Down the Drain," which is a tour of the Metropolitan Sewer District's Mill Creek Wastewater Treatment Plant. The tour is Saturday, April 5, from 9:00 am-noon. Rohm and Haas will pay for the tour; provide transportation and a lunch for any CAC members or members of the Junior/Senior High School's Environmental Club who want to go. She will pass a sign-up sheet around at the March CAC meeting. (Information about the tour is included as a handout.)

Air Toxics Monitor & Citizen Odor Sampling Program Presentation Speaker - Kerri Castlen, Hamilton County Department of Environmental Services (HCDOES)

Background About HCDOES

Kerri handed out her business card. She explained that she works for the HCDOES, which is a contractor for the Ohio EPA. Her office handles inspections, investigates complaints and enforces local laws in Hamilton, Butler, Warren and Clermont counties. Kerri handed out copies of *The Breeze*, HCDOES' quarterly newsletter.

History of Air Toxics Monitor in Reading

- The monitor was located in a utility shed near the Reading community swimming pool in 1996 at the request of the Ohio EPA. At that time, the HCDOES was getting a lot of citizen complaints from the Reading area.
- Ohio EPA pays for the monitor and the lab analysis. Ohio EPA and HCDOES both publish data from the air toxics monitor. Kerri handed out a copy of the 2001 Air Quality Data Report issued by HCDOES. She also distributed copies of the full data reports from the Reading monitor from 2000-2002.
- HCDOES began having mechanical trouble with the Reading monitor in 2002 so Ohio EPA recommended that they install a new monitor at a different location in or around Reading. Letters were sent to CAC members and anyone who had ever called in an odor complaint, asking for opinions as to where to place a new air monitor. HCDOES received two responses to the letter a call from the U.S. EPA and a letter from Karen Arnett who is with ECO, the Environmental Community Organization. Karen's letter was handed out to CAC members.

Air Toxics Monitor Description

- Air samples are taken every 12 days in a SUMMA canister, which is hooked up to a pump that takes a composite sample over a 24-hour period. With composite samples, you don't see a spike for a particular chemical; you just see a 24-hour average.
- The method used for lab analysis is U.S. EPA T0-14, which tests for 60 compounds. A blank box on the analysis report for an individual chemical means that the sample was non-detect for that chemical. The numbers reported are in parts per billion. (A part per billion is equivalent to 1 second of a 32-year period.)
- Q: Do the blank boxes on the report form mean that a compound was not found?
- A: Yes, it means that chemical was not found at that detection limit. That doesn't necessarily mean that that compound was not present at all.
- Q: When the HCDOES or Ohio EPA reviews the data, what do they look for that would be of cause for concern?

A: Let's review 2001 Ohio EPA report that compares all of the monitoring data from Ohio. The compounds highlighted in yellow indicate they were the highest in the state. A lot of these hydrocarbon compounds were highest in the Cincinnati area. The HCDOES thinks this could be due in part to readings from the Reading monitor.

A lawn mower, gas can, and pool chemicals were being stored in the same utility shed where the Reading air monitor was located. These items were not stored in the utility shed when the monitor was first placed there in 1996. This may or may not be the reason Cincinnati has these high levels, so that is another reason why the HCDOES and the Ohio EPA want to keep a monitor in the Reading area

Q: Was the Reading monitor the only one capturing these high levels in Cincinnati?

- A: No. The Reading monitor is just one of the monitors located in Cincinnati. The data sheet just averages all of the Cincinnati monitors. We also have monitors in Lower Price Hill, Carthage and one or two other sites in the city.
- Q: According to Karen Arnett's letter, swimming pools are a known source of chloromethane. Is this true?
- A: Yes. U.S. EPA posts that on their website. Chlorine in the swimming pools reacts with organic materials and can form chloromethane.
- Q: Can the high chloromethane numbers in the data sheets from Reading be attributed to the location of that monitor near the swimming pool?
- A: Probably not, because the HCDOES did not see a difference in the numbers between summer and winter months, when the pool was closed.

Relocation of Reading Air Toxics Monitor

Why move it?

- 1. Interference with lawn mower and gas can.
- 2. Citizen concern over location in general.
- 3. Prevailing winds are out of the southwest, which would mean the monitor would be more effective if it was placed north of the Rohm and Haas site.
- 4. Security. There were lifeguards and city employees constantly going in and out of the utility shed.

What is needed at a new site?

- 1. Electricity to run pumps.
- 2. Security.
- 3. Shelter from the elements.
- 4. A building where noise from the pumps would not disturb occupants.
- 5. No interference from cars, smoking or other localized sources.

Potential New Sites?

Ohio EPA and HCDOES reviewed several possible locations in the Reading/Evendale area. They were:

- 1. **Thomas Kidd Adult Center** site was eliminated as a possibility because the noise would affect occupants and the area where the monitor would be placed would have been near the smoking/break room
- 2. Elks Club site was eliminated because there was no electricity on the side of the building where the pumps would have been placed.
- 3. **Cincinnati State** this is the HCDOES preferred site right now. It is downwind of Formica, Cincinnati Drum, Rohm and Haas and Rosemont. This could be a great location to pick up anything in the air.
- Q: Will there be a problem with automobile exhaust on Reading Road?

- A: Yes, mobile sources are often picked up.
- Q: Could you place more than one monitor in the area?
- A: Probably not, because samples are \$250-\$300 each, and it would be cost-prohibitive.
- Q: What is the goal of the air monitoring program? Is it to find the worst-case air emissions?
- A: The goal is to collect data from the Cincinnati area. Toxics monitoring can be more important than sampling for ozone.
- Q: Do you have any recommendations for places to possibly put the monitor?
- A: Gorman Heritage Farm on Reading Road in Evendale. Koenig Park in Reading. Never Properties on Medallion Drive in Evendale.
- Q: How soon do you want the new monitor in place?
- A: As soon as a new location is identified. Hopefully within the next couple months.

Comments:

There was some discussion that the wind direction changes and sometimes it does come out of the north. Every time the plant gets an odor complaint from Bernard St., the wind is out of the north.

Citizen Sampling Program

- Started by the City of Cincinnati's Office of Environmental Management (OEM). OEM gave them to 4-7 residents to take air samples at any given time. OEM was recently eliminated from the city's budget and HCDOES inherited the air monitors.
- The advantage of citizens taking air samples is that the samples can be taken instantaneously, instead of waiting for someone from HCDOES to respond to a complaint. The disadvantage is that not all of Rohm and Haas' chemicals are on the Ohio EPA's TO-14 analysis list. Special analysis can be requested to search for a specific compound that is not on the EPA's TO-14 list.
- Kerri demonstrated how to take an air sample using a SUMMA canister. CAC members agreed that Dave and Margie Lehrter should take the SUMMA canister home to take an air sample when they detect a strong odor. Once the sample is taken, they are supposed to call Rohm and Haas and the HCDOES so they come pick up the sample and submit it for analysis. Kerri handed out a copy of the citizen air sampling procedures.

What Does the Data Mean?

- The data is valuable, but it is hard to determine what all of the data means. Usually a toxicologist is hired to conduct a risk assessment to measure what the risk is to the community. This is a difficult science. Risk assessments are hard to do for a population because there are so many factors.
- Starting a citizen sampling program will help give you information, but it may not give you all of the answers you are looking for.

Comments:

George Hettle, Jr. commented that the city of Cincinnati was sampling the air as far back as 1941. He added that the quality of air in Reading is much better today than it was in the 1940s. Kerri added that HCDOES inspectors attend smoke school so they can evaluate the smoke that comes out of a factory's smokestack.

Morton/Rohm and Haas Compliance History

• HCDOES has received Rohm and Haas' Title V draft permit application to reduce its methyl chloride emissions.

- The plant will pay a \$35,000 fine to HCDOES for the methyl chloride release it had in November 2001. 20% of the fine goes toward planting trees, 40% goes to Ohio EPA, and 40% goes to HCDOES.
- HCDOES no longer receives odor complaints about Rohm and Haas because the plant has its own odor hotline. Anyone is still welcome to call HCDOES to make an odor complaint. Kerri handed out magnets with the 24-hour odor hotline number.

The meeting adjourned at 8:10 p.m.



AGENDA October 24, 2002 6:00 p.m. — 8:00 p.m.

Sign-In All Introductions All Dinner All

Plant Update Bruce Beiser

Community Issues Update Neighbor Members

Announcements All

Responsible Care & Sustainable Development Kathy Maher
Rohm and Haas

Product Stewardship Director

November Evaluation Bethany Dale

** REMINDER**

The November meeting will be Thursday, November 21.



October 24, 2002 Meeting Minutes

Members Present

Bruce Beiser
Suzie Bateman
Rachael Belz
Bill Ford
Jon Hopkins
Chief Kevin Kaiser
Curt Lambert
Jim Pfennig
Sabrina Smith
Barb Stall
Margie Stall
Nancy Stall
Linda Stichtenoth

Speaker Kathleen Maher

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone, reviewed the agenda and explained that a videographer would be taping the guest speaker's presentation on Sustainability and Responsible Care. CAC members and guest speaker, Kathleen Maher, introduced themselves. Dinner followed.

Plant Update (Bruce Beiser) Safety

• The plant had its second OSHA recordable injury of the year on October 16, when a chemical operator inhaled chlorine vapor from a leaking tube fitting when the pressure in the line was increased. The operator was fine at first, but later experienced breathing difficulty and did go to the hospital several hours after the incident.

Environment

Sewer

The plant experienced six wastewater permit exceedances for chloroform since the last meeting. The source of the chloroform is believed to be the odor control scrubber. The plant has a testing and analysis program underway to confirm the source.

Q: How high of a level was the chloroform?

A: The limit is 0.1 lb per day. We were at 30-40 ppm. It wasn't high, but it was present.

Air

- There were no air permit violations, exceedances, or reportable releases during the past month.
- The plant did have one chlorine leak that was less than 0.2 pounds.

RCRA Site Investigation

There was a question during the RCRA site investigation as to whether or not the plant's groundwater recovery system was 100% effective because there were some signs of leechate on the Mill Creek bank. Geomatrix was at the plant to do pumping tests to determine if the plant's groundwater recovery system is capable of containing the groundwater and preventing seepage to the Mill Creek.

Odor Reduction

• Bruce reported the plant had received seven odor complaints since the last meeting. Six of the complaints were received from residents on Bernard Ave. and one was received from a plant employee. The odors were described as "rotten egg" or "mercaptan."

 September 5
 6:30 p.m.

 September 8
 2:50 p.m.

 September 9
 4:10 p.m.

 September 11
 4:55 a.m.

 September 11
 8:20 p.m.

 September 20
 11:00 a.m.

 September 29
 8:27 p.m.

- At the last meeting Margie Lehrter inquired about ways to become more involved with tracking the odors and working to solve odor problems. Bruce said that Curt Lambert and Eric Walker were going to meet with Margie to discuss options that will help quantify odor readings at her house.
- Bruce added that the plant's new ester process has been implemented and process optimization is still going on. This has reduced the amount of excess 2-mercaptoethanol (2-ME) material used in that process from 40% to 25%. The plant has also reduced the concentration of 2-ME that goes into the wastewater from 13% to 10%.
- The plant is continuing to work on its implementation plan for the ventilation projects. Plant engineers, corporate engineers and Jacobs Engineering are evaluating the consolidation of two vent surge tanks to one, and what those cost options would be. They already have the design for the man-way exhausts and the pressure relief filters. The ventilation project is still targeted to be up and running in Spring 2003.

Methyl Chloride Emission Reduction

• The plant is contacting several manufacturers to get design information for the replacement of the current compressor system, which is contributing to the emissions. There is moisture in the gas stream that is causing problems with the project design.

Community Relations

- Bruce told the CAC that he has agreed to participate on Reading High School's Strategic Action Team. The team will establish planning goals for continuous improvement and evaluate new and existing school programs.
- The plant sponsored two Reading High School teachers at the Teachers, Industry and Environment Conference in Dublin, Ohio. The teachers were Cheyenne Ritz and Cindy

Taylor. The sponsorship covered transportation, lodging, materials, registration and the cost of a substitute teacher.

Early Truck Arrivals

- Bruce reported that seven trucks have come early since the last meeting (5 weeks ago).
- Of the seven trucks that arrived early, 3 arrived before 6:00 a.m. The plant requested that one of those trucks arrive early and the plant accepted delivery of the product as soon as the truck arrived at the site. The other four early trucks arrived between 6:00 and 7:00 a.m.

Community Update

Shelter In Place

Chief Kaiser said members of the Reading fire department and their families went door to door to a few areas in Reading on Saturday, October 12, to talk about smoke detectors, carbon monoxide detectors, and Shelter In Place. The day was called "Our Family Working with Your Family," and was sponsored by the American Red Cross. The fire department was pleased that 85% of the homes visited had working smoke detectors. The national average is 50-60%. The fire department gave out 16 carbon monoxide detectors, 67 smoke detectors and 7 batteries to homes that needed them. They visited 200 homes. The fire department also handed out Shelter In Place literature, magnets and pens to each of the families.

Kevin said the fire department appreciates the Shelter In Place support the CAC has given to the fire department and the community. Together the CAC and the fire department are educating the residents of Reading. In light of this, he nominated the CAC for the Alliance For Chemical Safety's 2002 Best Communicator Award. Kevin passed out copies of his award nomination.

- Q: Were the residents you visited on October 12 responsive to the Shelter In Place information? Did they seem concerned?
- A: The fire department puts notices out to the residents that we are coming. The people that don't want to talk to us don't answer their door. The people we spoke to were very receptive. We educate people about fixed sites, highways and the rail lines. The fire departments' biggest concerns are the highways and rail lines because we don't always know what's traveling through.

Bruce said he appreciates the time that the CAC members commit to attending the meetings.

Rachael Belz added that we should market the CAC to get more members and spread the word about what the CAC is working on.

Q: Where do I get Shelter In Place information? I need to make a presentation at work.

A: Bethany said she could get additional information from the Alliance for Chemical Safety and could provide the Rohm and Haas Shelter In Place give-aways to supplement the presentation and literature.

Announcements

• Suzie Bateman reminded the CAC that The American Cancer Society's Relay for Life would be June 13, 2003 at Reading Stadium. She asked the CAC if they would like to form a team for the Relay. The CAC committed to having a team.

• Suzie added that she is working on a fundraiser for a little girl that needs \$300,000 for a bone marrow transplant. She will be selling dance tickets if anyone is interested in buying some. Linda Stichtenoth said the plant could sell the dance tickets in the cafeteria. Suzie said the dance would probably be held in December.

Responsible Care and Sustainable Development Presentation (Kathleen Maher) Kathleen Maher, Rohm and Haas' Director of Product Stewardship, traveled to the CAC meeting from Philadelphia, PA to present the company's position on Responsible Care and Sustainable Development. A copy of her biography was available as a handout.

Please refer to the enclosed copy of Kathleen's power point presentation as a summary.

Questions, Answers, Comments about the Presentation

- C: Jim Pfennig said that he and Kevin Kaiser are members of the local Kiwanis club. Together, all Kiwanis members in the country have raised \$75 million for the Morton salt iodine deficiency initiative to protect newborns from iodine deficiency, which can lead to mental retardation.
- Q: In which developing countries does Rohm and Haas operate?
- A: China, Singapore, Malaysia, Korea, and India.
- C: It is interesting that you brought up the AIDS epidemic in China. Years ago, so many industries were in denial about sustainable development. I like the idea of "radical transparency" that you mentioned. If the Chinese were to use that approach, they might make progress with the AIDS epidemic. It is good that Rohm and Haas is taking sustainable development one step further.
- Q: Which industries are leading the way in sustainable development?
- A: The chemical industry received an A-. Other highly rated industries were the global automotive industry, the waste industry because they have made a lot of progress in handling waste and preventing environmental damage, and the refrigeration industry. There is a whole investment fund that lists industries and companies that are considered to be leaders in sustainable development. The fund managers are trying to show business managers that if you are thinking about the issue and working towards it, then people will invest in your business.
- Q: Which industries aren't doing well with sustainable development?
- A: Communications and advertising industries were rated poorly because they aren't using their ability to influence public opinion about sustainable development. The electronics industry was also rated poorly because its products aren't being recycled properly. They are often shipped to third-world countries, where labor is cheap and there are no safety or health laws to protect workers.
- Q: Will the ISO standards eventually take sustainable development into account?
- A: The chemical industry is working on that by having Responsible Care codes made into management systems. The British government and environmental organizations, like the World Environment Council, are trying to establish standards for a sustainable development management system. Once a management system is in place, sustainable development performance should improve.
- C: The plant had record production this year, yet reduced its waste from the previous year. In addition, the plant greatly reduced the water it uses per pound of product by 40%. The plant makes two major product lines for heat stabilizers. One of the product lines uses a raw material that is a natural by-product of pine trees. The other product line used to be

lead based but now uses an organic element. A site vulnerability assessment will be conducted at the site next week to determine what the plant needs to do to increase security.

Q: How many people at Rohm and Haas work on sustainable development?

A: There is no one sustainable development department at Rohm and Haas. Several areas of the company, such as environment, health and safety; research and development; and specialists within the various business units, work together to educate employees about sustainable development and how they might act on the concept.

Q: Does Rohm and Haas' have a budget for sustainable development projects?

A: Yes, we just went through the budget process, but I'm not sure how much we ended up with. There is money in the EHS and research budgets. People often make up the budget difference with there own energy.

Bethany thanked Kathleen for her informative presentation.

CAC Evaluation Form

Bethany distributed a draft CAC evaluation form and asked members to review it to determine if the nature and extent of the questions were appropriate. The goal of the evaluation is to give CAC members an opportunity to reflect on where we are, what we've accomplished, what we can improve or change, and where we should head in 2003. A few suggestions were made to improve the evaluation. Bethany will mail the final evaluation form for members to complete before the next meeting. She will tally the results and report back on them at the November 21 meeting. After reviewing the evaluation results in November, the CAC can decide on its meeting schedule and agenda for 2003.

The meeting adjourned at 8:05 p.m.



AGENDA August 8, 2002 7:00 p.m. — 9:30 p.m.

7:00	Sign-In	
7:10	Dinner	
7:40	Plant Update (June & July)	Bruce Beiser
	Community Issues Update	Neighbors
	Announcements	All
8:00	History of the Ohio River	Dr. Chris Lorentz
8:30	Enjoy the cruise	

The next CAC meeting will be Thursday, September 12. We will be touring the Rohm and Haas plant.



August 8, 2002 Meeting Minutes

B&B Riverboat Dinner Cruise Covington, KY

Members Present

Suzie Bateman
Rachael Belz
Bruce Beiser
Bill Ford
Debbie Goodhart
Jon Hopkins
Chief Kevin Kaiser
Cheyenne Ritz
Sabrina Smith
Barb Stall
Margie Stall
Nancy Stall
Linda Stichtenoth

Visitors Present

Nancy Beiser
Charlotte Burke
Holly Courtney
Andy Dale
Polly Ford
Lauree Kaiser
Chris Lorentz (Guest Speaker)
Dave and Jackie Lorentz
Keith Stichtenoth
Amanda Teder

Facilitator

Bethany Dale

The meeting was held in a private room on the third floor of the Belle of Cincinnati Riverboat. The boat left the dock at 7:00 p.m. Members and visitors were asked to meet inside the meeting room at 7:20 p.m. Bethany welcomed everyone and reviewed the agenda. CAC members and guests introduced themselves. A buffet dinner followed.

Two Month Plant Update (Bruce Beiser) Safety

• The plant has operated 638 days without a lost-time injury. The last OSHA recordable injury occurred September 19, 2001.

Environment

Sewer

There were no wastewater permit exceedances. An industrial investigator from MSD visited the site on July 18. He noted no violations, problems or concerns.

Air

- There were no air permit violations or exceedances during the past two months.
- The plant did experience four non-reportable air releases in the past two months. They were as follows:
 - June 21 35 lb methyl chloride release, caused by a corroded fitting on the gas separator recovery system.
 - July 17 2.8 lb chlorine release, caused by a pin hole in a flex connection.

- July 23 46 lb methyl chloride release due to a pinhole leak in a welded fitting in a transfer line. That weld was cut out of the line and is being x-rayed.
- July 31 20 lb methyl chloride release from packing assembly failure on the recovery compressor.
- None of the above mentioned releases resulted in any permit violations.

Solid Waste

• In a previous meeting, Bruce reported that residue from the plant's stannous chloride reactor was reported to have radioactivity. The radioactive waste in the drums was sampled and determined to represent a dose of 0.4 milligrams/year. The average background radiation is 360 mg/year. The limit for workers in the x-ray field is 5,000 mg/year. The limit for public exposure from a radioactive source is 100 mg/year.

Odor Reduction

- There have been five odor complaints since the last meeting. The odors were described as "rotten egg" or "foul." Nothing abnormal was found in the investigation of the odor source.
 - July 5 6:50 p.m.
 - July 6 8:24 a.m., 11:32 a.m., 6:15 p.m.
 - July 10 9:40 p.m
- The new ester process will start next week.
- The plant was shutdown this week for maintenance.
- The plant is evaluating six options for the ventilation project. Jacobs Engineering will be on site next week to help the plant evaluate its options. They will also evaluate the plant's scrubber to see if it is operating at maximum efficiency.

Methyl Chloride Emission Reduction

• The contractor completed the four-week characterization study on July 26. The data is due August 9 and will include flow rates, temperature, composition and pressure data. Engineering will compute the material balance to determine the compressible ratio. Then the plant will have enough information to do process simulation and technical evaluation.

Community Relations

- The plant hosted two students from the University of Dayton's Women in Engineering Camp.
- The plant launched a Character Counts Employee of the Month program. This is a program to promote character in the workplace and recognize employees who exhibit designated character traits. The plant has a code of business conduct that all employees must read and sign, which also ties into promoting character and ethics. (Linda Stichtenoth brought a few copies of the character traits discussed in the Character First! program.)
- The annual blood drive is scheduled for September 11. Everyone is welcome to donate. Hoxworth has told the plant that they are one of the best sites they travel to because about 45% of available plant employees donate. The plant will have a moment of silence at noon on September 11 to remember those who died last year, rescue workers, and those who have and are serving in the war on terrorism.

Early Truck Arrivals

- Bruce reported the past two months have not been very good for early trucks. In the last 8 weeks, 26 trucks arrived at the plant prior to 7 a.m.
 - 18 arrived between 6:30 a.m. and 7:00 a.m. (7 were Highway Transport trucks)
 - 4 arrived between 6:00 a.m. and 6:30 a.m.
 - 2 arrived between 5:00 a.m. and 6:00 a.m.
 - 1 arrived at 1:00 a.m.
 - 1 arrived at 1:30 a.m.

- Bruce said every one of the early truck arrivals has been addressed with the drivers and the carriers.
- The plant met with Highway Transport and expressed that they are not complying with the plant's delivery time. The plant threatened that if the drivers don't comply, they will have to sit outside the gate and will be the last truck unloaded.

Through Trucks on Bernard Avenue

- The plant hired a Viox employee to conduct a two-week study of the truck traffic entering the plant and coming down Bernard Avenue.
- During the 10-day study, 297 trucks went to Rohm and Haas and 74 trucks went to Rosemont.
- Out of that number, 9 drove down Bernard Avenue. Those 9 trucks were: Alpine Valley Water, S&S Delivery Van, J.C. Express, Hurrington, Ohio Valley Petroleum, Arbor Design (landscaper), Genova Express, Complete Mechanical Services, Town Air Freight.
- Q: How many of those 9 trucks were trailer trucks?
- A: Three were trailer trucks, but there were no tank trucks.
- Bruce added that all of the drivers were notified to correct their route.
- All truck drivers and carriers are also receiving a new letter outlining truck delivery and safety issues. Lately the plant has had problems with drivers having cell phones, smoking in the plant, wearing shorts and bringing children and pets with them. All of these activities represent safety hazards.

Questions, Answers and Comments from Bruce's Plant Update

- Q: What were the three dates of the methyl chloride releases?
- A: The methyl chloride releases occurred on June 21, July 23 and July 31. The chlorine release occurred on July 17. (The reportable quantity of methyl chloride is 100 lbs. The reportable quantity of chlorine is 10 lbs.)
- Q: Were all nine of the trucks that came down Bernard Avenue coming to Rohm and Haas?
- A: Yes they were, and we have addressed the issue with each of the drivers.
- Q: Will you do another inventory of truck traffic and through trucks coming down Bernard Avenue?
- A: We weren't planning on it. I did share the information with the police chief so he can increase patrol.
- Q: How do you know how many trucks come early every month?
- A: Our security guards keep a log and note the time of arrival and they report that to me.

Rachael Belz added that she had talked to Gene Koetter and he had counted about 30 early truck arrivals at the plant during the past two months.

Bruce concluded that one of the delivery companies out of Wisconsin usually delivers product by rail car. The rail road bridge near that town was out, which forced the supplier to deliver using trucks. The driver arrived early because he didn't know about the time restrictions. Bruce noted that while the plant lost some ground over the past two months regarding early truck arrivals, there was an increase in the number of delivery trucks coming into the plant.

Community Update and Announcements

There were no additional community updates or announcements.

The History of the Ohio River Presentation by Dr. Chris Lorentz

Bethany introduced the guess speaker, Dr. Chris Lorentz, who is an Associate Professor of Biology at Thomas More College and the Director of the Center for Ohio River Research and Education in California, Kentucky. (Dr. Lorentz' biography was available as a handout.)

Please refer to the enclosed copy of Dr. Lorentz' presentation as a summary.

Questions and Answers about the Presentation

Q: How big are the fish in the Ohio River?

- A: The largest fish are the sturgeon or the alligator gar, which get 9-10 feet long. The biggest fish in this area, paddlefish and catfish, can get 6-7 feet long.
- Q: You mentioned the river is pretty flat as far as rivers go, what is the other extreme?
- A: Steeper rivers would be somewhere like the Colorado mountains. The Allegheny River in Pennsylvania has a gradient about 5-10 times higher than the Ohio River. Most of the rivers in the Midwest, like the Mississippi, are fairly flat.
- Q: How is Thomas More's Field Station funded?
- A: It is mixture. We have been fortunate that the college supports the Field Station. We also get grants from Cinergy, Ashland and Procter and Gamble for research and environmental education purposes.
- Q: How deep is the Ohio River now?
- A: The river can be thought of like a swimming pool. The Meldahl Dam, which is upstream of Cincinnati, is like the shallow end of the swimming pool at 12 feet. The Markland Dam, which is downstream, is like the deep end of the pool at 50 feet. Cincinnati is right in the middle and is about 25 feet deep. The depth varies though depending on the area and rainfall.
- Q: How shallow did the Ohio River start out?
- A: On average it started out about 14 inches deep.
- Q: Is the river muddy everywhere?
- A: Yes, it is a muddy river everywhere. It is more turbid in areas where there are more tributaries that flow into the river.
- Q: Why is the river so muddy?
- A: There is a lot of developed land along the river. When it rains, the rainwater runs off of the developed land and farms, and carries sediment into the river. The more natural an area is, the cleaner a stream will be.
- Q: How did you get interested in the field?
- A: I was a sophomore in college and got a scholarship to attend an Audubon ecology camp. I spent time in Maine banding birds, dredging the ocean and studying wildlife. I loved it and knew that is what I wanted to do. I went to Kent State, studied the Great Lakes, and attended Ohio State University's lab campus, Stone Lab, on Lake Erie.

Bethany thanked Chris Lorentz for presenting. Bruce thanked everyone for coming to the meeting. Bethany adjourned the meeting at 9:00 p.m. The boat docked at 9:30 p.m.



Cincinnati Facility

AGENDA June 13, 2002

Sign-In
Plant Update
Community Issues Update
Announcements
Crossroads Celebration Summary
2001 Toxics Release Inventory Report
RCRA Site Investigation – Final Report
August CAC Meeting Discussion

All

Bruce Beiser Neighbors

All

Chief Kaiser Robin Cole

Bruce Beiser

All

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June 13, 2002 Meeting Minutes

Members Present
Rachael Belz
Bruce Beiser
Jon Hopkins
Chief Kevin Kaiser
Gene Koetter
Curt Lambert
Margie Lehrter
Cheyenne Ritz
Linda Stichtenoth

Visitors

Robin Cole (Rohm & Haas plant Environmental, Health and Safety Manager)
Sabrina Smith (Reading High School Student, member of school's Environmental Club)
Christa Zielke (Environmental Community Organization, ECO)

Facilitator

Bethany Dale

The meeting started at 6:05 p.m. in the second floor conference room at the Rohm and Haas plant. Dinner was provided. Bethany welcomed everyone, reviewed the agenda and introduced Robin Cole, the plant's Environmental, Health and Safety manager and presenter of the TRI information.

Plant Update (Bruce Beiser)

Safety

• The plant has operated 580 days without a lost-time injury. The last OSHA recordable injury occurred September 19, 2001. The plant did not have any first aid incidents this month; however, one contractor cut his hand and had to get stitches.

Environment

- There were no wastewater or sewer violations during the month.
- There were no air releases during the month.
- The plant continues to work on the methyl chloride emission reduction project. A contractor will be coming in the week of June 17 to test flow rates, temperatures, composition of gas streams and moisture content. The purchase order for this data collection has been released. The contractor will gather the data for one month. This testing is required because as the plant got involved in the design parameters, it realized that it only had annual numbers available for these criteria. The new methyl chloride emission reduction system will need to know what the instantaneous numbers are at any given time for these criteria.

O: What are the tests for?

A: We are logging the data to validate the design of the methyl chloride recovery system. We know over a year's time what the average flows are. We don't know what they are minute by minute or hour by hour so that in any point in time the system can handle the fluctuation of flows. This data will allow us to size the unit correctly. The target goal of the new equipment is to capture 98% (or less than 10 tons emitted) of the methyl chloride the plant emits to the air.

Q: Will this testing tell you if you are still on track to achieve that goal?

A: The data collected will tell the plant if this goal is feasible and, if so, what the best option is to achieve these reductions. We also want the new system to be able to handle any increase in production as well.

Q: Who will be doing the testing?

A: We contracted with URS to conduct the testing and data collection. It is expected to cost \$50,000.

<u>Odors</u>

• The plant received four odor complaints since the May 9 meeting. They were called in as follows:

May 17	7:05 p.m.
May 20	9:14 p.m.
June 6	12:08 p.m.
June 7	11:33 a.m.

Bruce said the plant found no cause of the odors other than normal operations.

• The project team that is working on the odor reduction/ventilation of building 3/3A is working on getting Jacobs Engineering to provide technical expertise in this area.

Early Truck Arrivals

• Bruce reported the following truck log regarding trucks arriving to the plant prior to 7:00 a.m.

Date	Number of Early Trucks	Time of Arrival		
wk of May 6	5	1 at 5:40 a.m. 4 between 6:45-7:00 a.m.		
wk of May 20	2	12:30 a.m. (plant requested this early delivery) 4:30 a.m.		
wk of May 27	1	6:45 a.m.		
wk of June 3	3	3:30 a.m., 5:30 a.m., 6:45 a.m.		

- One of the early trucks was delivering piping for the ester project. The contractor did not notify the delivery truck of the delivery time restrictions at the plant?
- **Q:** Was that truck out of West Virginia?
- A: I am not sure where they were from, but it was H&W Trucking. Gene Koetter confirmed that was the trucking company out of West Virginia and commented that the

truck driver was unpleasant. Gene told the driver about the parking restrictions and said the driver became belligerent with him. Bruce said he addressed the issue with their contractor.

• Bruce said the unexpected 4:30 a.m. delivery came from Canada. It was a shipment of material that was being imported on a railcar. One of the containers of material got jarred during shipment and the product began leaking inside of the railcar totes. The container was unloaded from the railcar and the material was pumped (approx. 300 gallons) into a tanker truck. The tanker truck was sent to the plant with the product. It was a carrier that did not have delivery instructions.

Through Trucks on Bernard

Bruce said he has received calls from Gene and Margie Lehrter about trucks coming up Bernard Avenue. He distributed a copy of a letter that guards are now giving every driver that comes into the plant. Bruce said dispatchers from trucking companies are pulling directions to the plant off of the internet, and internet directions do not state which streets are closed for truck traffic. Gene added that Highway Transport and Yellow Truck lines are both coming early and driving up Bernard. Bruce said he files complaints with every carrier that comes to the plant early. Margie added that Bernard is very heavily traveled during the day, especially on Mondays and Tuesdays. She asked if there is any way for the police department to increase enforcement of the "No Through Trucks" law. Bethany suggested that the CAC write a letter to the City of Reading requesting more enforcement. Bruce said he would like to explore a few options such as hiring an off-duty police officer or adding a security guard on the corner of Bernard Avenue to monitor truck traffic and work on enforcement of through traffic of trucks on Bernard.

Community Relations

• The Rohm and Haas \$1,000 Scholarship was presented to Erica Hellman who will be attending UC in a pre-pharmacology program.

• The plant hosted a Boy Scout troop on June 8 so they could earn their merit badges.

Additional Questions and Community Issues

Q: Was there any additional information gathered about the radioactive drums?

A: No. Rohm and Haas Philadelphia didn't provide any additional information to the laboratory yet. Robin said she spoke to a radioactive expert (toxicologist) at Rohm and Haas' Springhouse Facility and that person said the numbers were close to baseline. Bruce said he would have more specific information about the quantities detected at the next meeting.

Margie added that even though the levels detected were extremely low, it is not good for employees to be around it all the time.

Community Announcements

• The "Catch the Fever" mercury thermometer exchange program sponsored by the health department went really well.

• The American Cancer Society's Relay for Life will be June 28-29 at Reading Memorial Stadium. The Fire Department will be involved and has several fund raisers planned. All proceeds will be given to the American Cancer Society.

The City of Reading fireworks show will take place on July 6 at Koenig Park.

Crossroads Celebration Summary (Chief Kevin Kaiser)

Kevin said there were plenty of volunteer firefighters and CAC members to work the booth. He said the weather was nice and lots of people came to the booth. Everyone liked the handouts and give aways, especially the bubble pens. The fire department did not run the Shelter in Place power point presentation due to a sun glare on the computer screen.

Kevin said the fire department will have a booth at the Taste of Reading this summer and we can set up Shelter In Place information there as well. Cheyenne Ritz, Sabrina Smith and Kevin each drew a name from the envelope of tickets collected during the Crossroads Celebration to win the programmable weather radios purchased by the plant and the fire department. The winners were the Jackie Ellison, Kim Schierloh and the Roger's family.

2001 Toxics Release Inventory (TRI) Presentation (Robin Cole)

For a summary of Robin's presentation, please see the attached copy. Robin stressed that these numbers are in draft form. The TRI reports are due to the U.S. EPA and Ohio EPA on July 1, 2002.

Q: Will changing the method used to calculate TRI data from a production rate to an emission rate give the plant a "truer" or more accurate number?

- A: TRI calculations based upon an inventory of chemicals can cause discrepancies because inventory methods often change. Using an emission factor rate is more consistent because the calculations can be factored per batch of product, which never changes.
- Q: How do you account for an accidental release using an emission factor rate?
- A: You can't, you would just manually add the quantity accidentally released.
- Q: How would the new calculation system account for fugitive emissions?
- A: Fugitive emissions would be accounted for in the emission factor rate.
- Q: Do you have a timeline for when you hope to get the methyl chloride reduction equipment in operation?
- A: Not anymore. We have to get the data I mentioned earlier tonight, analyze the data, select the appropriate control process and set up the project scope. It depends on whether we go with a cryogenic chiller, mechanical refrigeration or an option we don't know about yet.
- Q: What did you said you no longer run that eliminated methanol releases to the water and wastewater?
- A: It was a thioester process (antioxidant) that we discontinued manufacturing because we sold the product line to another company.

The plant has reduced its hazardous waste by almost 90% since it began reporting under the TRI program in 1987. Getting rid of the thioester product line that used the methanol was responsible for 40% of the 90% reduction in hazardous waste.

RCRA Site Investigation Presentation (Bruce Beiser)

For a summary of Bruce's presentation, please refer to the attached copy.

A complete copy of the final RCRA 3013 Investigation Report will be filed in the Reading Public Library during the week of June 17. You will have to ask the librarian to view this report.

Q: How many feet is there between the upper aquifer and the lower aquifer?

A: It depends on where you are on the site. There are varying thicknesses of sand layers between the aquifers. There are maps that show the various distances and depths in the final report binders.

Q: Is anyone in Reading drinking groundwater from a well?

A: No. That has been researched and addressed.

August CAC Meeting Discussion

Bethany reviewed the invitation and program agenda for the August 9 CAC meeting in Louisville. She also presented an alternative for the August meeting — an Ohio River dinner cruise that would take place in Cincinnati. This would be similar to the agenda that the Louisville CAC set up. The river cruise would last about 2 hours and our CAC members would be welcome to bring a guest. We would have a plant update, dinner, and try to schedule a speaker who would give an historical account of the river. This would be our August CAC meeting.

The CAC members who attended the meeting voted to decline the Louisville CAC's invitation due to the low percentage of members who would be able to attend or commit to attending. A similar trip will be planned in Cincinnati on either August 8 or August 9.

Suggested speakers included someone from Rivers Unlimited, the U.S. Coast Guard, Metropolitan Growth Alliance or the Ohio Department of Natural Resources. Bethany said she would look into speakers and Linda Stichtenoth said she would research dates and boats.

Additional Questions

Margie mentioned that she was looking back through her notes and odor complaints from 1995. She said when she took a plant tour during that time, the plant said they were going to initiate several actions that would help the odor problem. She wanted to know if the following actions were ever taken: cover the wastewater sewer, control hood exhaust, install vacuum pumps, replace steam ejectors, control exhaust, cover pH wastewater pumping system, etc.

Bruce and Jon Hopkins said that almost everything Margie mentioned has been implemented. Bruce said the plant still has a few ejector systems that it is operating and there were two instances where the vacuum pumps were not successful. Bruce said they are installing a new design of vacuum pumps. Jon said the plant has also put in some new equipment to eliminate the filter presses.

The meeting adjourned at 8:00 p.m.



AGENDA June 14, 2001

Sign-In Introductions Plant Update Groundwater History at the Plant Groundwater Site Investigation

Questions & Answers Adjourn/Comment Cards All All

Bruce Beiser Bruce Beiser

Mark Hemmingway Geomatrix, Inc.

All All



Cincinnati Facility

June 14, 2001 Meeting Minutes

Members Present

Suzie Bateman

Bruce Beiser

Bill Ford

Debbie Goodhart

Kevin Kaiser

Gene Koetter

Dave Lehrter

Margie Lehrter

Jim Pfennig

Cheyenne Ritz

Bishop Donald Sorrells

Nancy Stall

Barb Stall

Margie Stall

Linda Stichtenoth

Visitors

Mark Hemingway (presenter) Lt. Scott Snow

Facilitator

Bethany Dale

The meeting started at 6:00 p.m. in the Reading Municipal Building, located at 1000 Market Street. Members signed in and were given an agenda, copy of Geomatrix' Environmental Investigation presentation, 7/07/01 Summary Report from the Working Group on Rohm & Haas, Rohm & Haas' corporate employee newsletter "Formula" and blank comment cards. Bethany Dale reviewed the agenda and introduced Mark Hemingway, principal hydrogeologist with Geomatrix, the company conducting the groundwater investigation at the plant. Bethany welcomed new members Suzie Bateman, Margie Stall and Barb Stall.

Plant Update by Bruce Beiser

• Environmental — There were no reportable releases. The plant had a low pH deviation in the south sewer. The plant does not discharge to the south sewer; therefore, the deviation may have been caused by the on-site laboratory.

- Regulatory On May 18, 2001 two inspectors from Hamilton County Department
 of Environmental Services and Air Quality Management conducted the plant's annual
 permit inspection. They reviewed the methyl chloride recovery process, the odor
 control scrubber and building 1 dust collectors. No findings were discovered. The
 report is expected the end of June.
- Community Involvement The plant presented a renewable scholarship of \$1,000 to a Reading High School student entering a program in chemistry or chemical engineering. The plant sponsored the fireworks for the Reading Memorial weekend celebration. The plant has ordered refrigerator magnets for neighbors providing a phone number to report an odor complaint or concern and a second phone number for emergency information.

Groundwater History at the plant (Bruce Beiser)

The current groundwater conditions and possible contamination at the site are connected to the plant operations of the 1950s and 1960s. The site was constructed in 1949 and operational in 1950. The plant had evaporation ponds, which were typical of the chemical industry at that time. Wastewater was pumped into these ponds where water would evaporate. The plant also had three dolomite pits where acid wastes were sent. The acids would react with the rock pits and neutralize. These practices occurred before RCRA regulations. Organic material seeped into the ground while the ponds and pits were used. The plant believes the waste went into the upper aquifer. Prior to RCRA regulations the pits and ponds were excavated and the dirt was removed and backfilled with new soil.

Groundwater Investigation Presentation (Mark Hemingway)

Please refer to Mark's presentation for more information about the groundwater investigation which is ongoing at the plant. Extra copies are available from Bethany Dale for any members who missed the meeting.

In summary, there are potential on-site sources of groundwater contamination that are under investigation.

- EPA identified four areas old ponds, swale area, drum storage area, facility sewer
- EPA identified 3 former above-ground storage tanks areas that require closure certification
- Rohm & Haas identified 7 areas of reported historical waste burial

Objectives of the groundwater investigation:

- Is the groundwater contaminated?
- If so, is the movement being controlled?
- Does any contamination pose a risk to workers, the local public, or the environment?
- If so, how does that risk compare with federal "acceptable limits"?

What does it take to answer these questions?

- Search for buried waste materials
- Determine the nature of flow of the shallow groundwater
- Sample groundwater and soils

- Inspect and sample Mill Creek
- Evaluate sewer system
- Understand background soils and water movement

Timeline:

- Planning documents started in Fall 2000
- Field work started in March 2001
- Field work completed November 2001
- Final data by January 2002
- Report of findings due to EPA by June 2002

Study Phases

- Phase I Spring 2001
 - Deep boring soil samples
 - Upper aquifer wells
 - Sewer camera survey
 - Inspect Mill Creek
 - Geophysical surveys
 - Plugging old monitoring wells
 - Groundwater sampling
- Phase II Summer 2001
 - Borings and soil sampling at former waste mgt. areas, along sewer, suspect waste burial areas, former ponds and swale areas
 - Installation of additional wells if necessary
 - Aquifer testing
 - Sediment sampling along Mill Creek
 - Ecological survey
- Phase III Fall 2001
 - Final well installation if necessary
 - Second groundwater sampling
 - Any other remaining work

Status of Investigation:

- Phase I is complete
- Some Phase II activities started in May 2001, remaining are scheduled to start in July 2001

Questions (Q) and Answers (A) & Comments (C) and Responses (R)

Q: What are the health risks of somebody who lived nearby during the 50-60s?

A: Part of the investigation is to measure whether or not these practices had any off-site consequences. The plant put in a groundwater recovery system to block the groundwater flow from Pristine because it didn't want Pristine's contaminated water on its property. In the early 1980s, the plant installed a trench drain adjacent to our property line along

the Mill Creek. The drain catches the upper aquifer groundwater in a trench. It is then pumped to the plant for treatment and re-used in the plant's cooling water system.

Q: Is it possible that the water contamination in Reading went back to that time?

A: Based on the information from Pristine, none of the contaminants found in the Reading groundwater have been found on our site. Our upper groundwater aquifer contaminants are not found on the Pristine site. There is a clay layer in between the upper aquifer and the drinking water. The plant feels it was not the source of the Reading groundwater contamination.

Q: Were the soils tested before the city swimming pool was built? How far can the contamination go?

A: There is a limit as to how far things can migrate. That is why the investigation is occurring. The city would be able to tell you if the soils were tested before the swimming pool was built.

C: The plant site is a collection of properties that were acquired. We know there was a winery, smokehouse and farmhouse on parts of the site. There is a lot of information we need to find as to what is in the ground and where it came from.

Q: Do you know if anything found from the farmhouse and smokehouses were carcinogenic chemicals?

A: We really don't know. The investigation will not determine the timeframe in which chemicals or other material may have gotten into the ground.

Q: What is the cost of this study?

A: The entire investigation up through when the report is submitted to the EPA will cost around \$800,00 - \$900,000. More than half of that will go to the analytical lab.

Q: Who hired Geomatrix?

A: Rohm & Haas's corporate office. The EPA has its own consultant who conducts quality assurance throughout the whole study.

Q: How many people are working on this investigation?

A: It varies depending on the phase of investigation. There have been as many as six people and a drilling crew and as a few as one or two people.

Q: Does Geomatrix hire the subcontractors?

A: Yes, all but the lab.

Q: If you find something, is the current owner or past owner responsible?

A: The investigation will determine whether the contamination was caused by Rohm & Haas activities, either today or of the past, or whether the problem was caused by Pristine. There is a good chance that the investigation will reveal Pristine chemicals on the Rohm & Haas site. Rohm & Haas will ultimately be responsible for taking care of

the problem regardless of who is responsible. It would then be up to Rohm & Haas to go after who it thinks may have caused the contamination.

Next Meeting

There will be no meeting in July. The next meeting will be August 9 from 6-7 p.m. in the same location.

The meeting adjourned at 7:05 p.m.

Rohm and Haas Cincinnati Facility CAC Members

Name	Affiliation	Address	City	State	Zip	Phone
	Reading School Board					769-6837 (home)
Bill Apking	President/Apking Janitorial	2247 Pompano Drive	Reading	OH	45215	733-5050 (office)
Suzie Bateman	Neighbor	329 Westview	Lockland	ОН	45215	733-8650
Bruce Beiser*	Rohm & Haas Plant Manager	2000 West Street	Reading	ОН	45215	733-2179
Carol Bullock-Carpenter	Sts. Peter & Paul Church	1544 Sanborn Drive	Reading	ОН	45215	733-4857
Jim Davis	Neighbor/Employee	217 Bernard Avenue	Reading	ОН	45215	769-0573
Bill & Polly Ford	Neighbors/Employee	229 Bernard Avenue	Reading	ОН	45215	733-4669
Debbie Goodhart	Reading Health Nurse	142 East Crest Drive	Reading	ОН	45215	842-1677 (work) 615-8344 (cell)
Chief Greg Hilling	Reading Police Dept.	1000 Market Street	Reading	OH	45215	733-4122
Jon Hopkins	Neighbor/Employee	1266 Sanborn Court	Reading	ОН	45215	563-2886
Chief Kevin Kaiser*	Reading Fire Dept.	1000 Market Street	Reading	ОН	45215	733-5537
Gene* and Carole Koetter	Neighbors	202 Bernard Avenue	Reading	ОН	45215	554-0329
Dave* & Margie Lehrter	Neighbor	232 Bernard Avenue	Reading	OH	45215	563-2362
Jim Pfennig	Reading Councilman	240 W. Vine Street	Reading	ОН	45215	733-3725 (work) 563-6255 (home)
Mike Rahall*	Reading Safety - Service Director	1000 Market Street	Reading	ОН	45215	733-3725
Earl Schmidt	Mayor of Reading	1000 Market Street	Reading	ОН	45215	733-3725

Rohm and Haas Cincinnati Facility CAC Members

Cheyenne Ritz	Reading Jr. High Science Teacher, President School Environmental Club (7-12)	810 E. Columbia Avenue	Reading	ОН	45215	733-4422
Bishop Donald Sorrells	Christ Temple Apolstolic Faith	325 N. Wayne Avenue	Lockland	ОН	45215	821-9476
Nancy Stall	Neighbor	200 Bernard Avenue	Reading	OH	45215	733-8398 (home) 733-3725 (work)
Barb & Margie Stall	Neighbors	208 Bernard Avenue	Reading	ОН	45215	733-3441
Linda Stichtenoth*	Rohm & Haas Community Relations/HR Manager	2000 West Street	Reading	ОН	45215	733-2213

^{*} indicates steering team member

CAC Facilitator

Bethany Dale

ETC, Inc.

31 Triangle Park Drive

Cincinnati, OH 45246 phone: 772-7903

Mailing List Only:

Ms. Mirtha Capiro USEPA Region V

77 W. Jackson Boulevard

Chicago, IL 60604-3590



AGENDA May 10, 2001

Sign-In Introductions Membership Update Working Group Update Plant Update U.S. EPA Risk Management Plan

Questions & Answers About RMP Adjourn/Comment Cards

All All

Bethany Dale

Linda Stichtenoth

Eric Walker Robin Cole

All All



Cincinnati Facility

May 10, 2001 Meeting Minutes

Members Present

Bill Ford
Debbie Goodhart
Jon Hopkins
Kevin Kaiser
Gene Koetter
Dave Lehrter
Margie Lehrter
Jim Pfennig
Cheyenne Ritz
Nancy Stall

Linda Stichtenoth

Visitors

Suzie Bateman Robin Cole Barb Stall Margie Stall Eric Walker (presenter)

Facilitator

Bethany Dale

The meeting started at 6:00 p.m. in the Reading Municipal Building, located at 1000 Market Street. Members signed in and were given an agenda, copy of the Rohm & Haas "Managing Chemicals In Our Community" brochure, copy of the Risk Management Plan (RMP) presentation and blank comment cards. Bethany Dale welcomed everyone and reviewed the agenda. Bethany announced a few changes in membership: Drew Vogel, Bob Hollmeyer, David Brazier and Don Vonderhaar withdrew from the CAC due to other commitments. Bethany asked members if they had any suggestions for new members and asked if anyone wanted to be on the steering team.

Plant Update by Robin Cole

- Environmental The plant had two pH deviations one in March and one in April.
 The plant received a Notice of Violation from the Metropolitan Sewer District for both of them.
- Emergency Response The plant held 24 hour Emergency Response Training on April 27 and 28 for its 40-member emergency response team.
- Community Involvement On April 23, the plant met with employees from the Reading School District to set-up a Junior Achievement program between Rohm & Haas, the Reading Chamber of Commerce and the schools. Junior Achievement is a

national educational program where volunteers from a business organization go into a school and teach students about economics and the free enterprise system. The plant is hoping to have about 13 employees participate in Junior Achievement.

U.S. EPA Risk Management Program Presentation

Mr. Eric Walker, Environmental, Health and Safety Engineer from Rohm and Haas presented the plant's Risk Management Program to the CAC. The Risk Management Program (RMP) is a federal regulation required by the U.S. Environmental Protection Agency. RMP requires facilities that have or store a certain minimum amount of a listed toxic or flammable chemical to share information with the public about the consequences of accidental releases from the site.

Rohm & Haas has four chemicals covered by RMP. They are: aqueous ammonia, methyl chloride, chlorine and ethylenediamine. The worst-case accident release scenario for the plant is a rupture of a chlorine tank that releases 110,000 pounds of chlorine gas into the air in ten minutes. This assumes that all safety devices fail and the chlorine forms a vapor cloud, which is carried 11 miles from the source in maximum downwind concentrations.

Rohm & Haas was also required to file four alternative or "more likely" release scenarios under RMP. In summary the four alternative releases are:

- 1. chlorine 25 pounds released to endpoint of 0.10 miles
- 2. ethylenediamine 650 pounds released to endpoint of 0.01 miles
- 3. methyl chloride 100 pounds released to endpoint of 0.03 miles
- 4. ammonia 150 pounds released to endpoint of 0.02 miles

Please refer to Eric's presentation or the brochure for more information about Rohm & Haas' RMP. Extra copies are available from Bethany Dale for any members who missed the meeting.

Questions (Q) and Answers (A) & Comments (C) and Responses (R)

Q: How does a facility figure out what its worst case scenario is?

A: They look at all the chemicals covered by RMP and determine which one would have the greatest off-site consequence. The EPA provides the toxic endpoints of a chemical release based on national models and programs.

Q: If the worst case accident happened, what would be the result to the people living in the neighborhood?

A: If it was chlorine and you are close enough and exposed to a high enough concentration for a long period of time, you could die. The 11 mile radius is not necessarily an immediate death area, it is a calculated endpoint in which people in the area could be affected.

Q: When chlorine is released, how high does it go in the air?

A: When it is released, it hugs the ground. It is a liquid when stored and turns into a vapor cloud when released?

Q: When a chlorine vapor cloud is released, can you see it?

A: It has never happened at the plant. It would form an invisible cloud but the properties of chlorine would enable you to smell it. Chlorine moves easily in the air and passes quickly.

Q: Would immediate neighbors be instructed to stay in their house?

A: Yes, you would shelter-in-place.

C: The Business Courier just ran an article about Hamilton County trying to establish its own emergency response system using weather radios. The article talks about shelter-in-place. Would the City of Reading be covered by this weather radio plan?

Q: Yes, the fire chief could telephone the county dispatch center to say there was an isolated emergency and notification needs to be made. The weather radio could be tripped to announce the incident and provide simple instructions for people in the emergency area to follow.

Q: If the plant had a chlorine leak, how long would it take before it was detected?

A: We would know almost as soon as it happened because we have chlorine monitors near all the processes that use chlorine.

C: Some of our biggest risks comes from the railroad, which carries chlorine and ammonia. Even small pipe leaks on railcars can be dangerous.

Q: How is chlorine transported to the plant?

A: It is transported and stored in a double walled railcar.

Q: Are the railcars that travel through Reading protected and monitored?

A: No, that's why the fire department worries about the railroads.

C: Chlorine is a chemical that is real easy to tell if you have a leak because of the strong odor. It doesn't take much to sense that you have a chlorine leak.

Q: How long would it take chlorine leaking from a moving railcar to disperse?

A: There isn't a good answer because it depends on so many weather factors. When the plant came up with its worst case scenario it had to assume the worst possible weather factors when the air would be very heavy and slow moving.

Q: Are the railcars that carry the chlorine brought into the plant? A: Yes.

Q: Do companies know when railcars are being delivered? Are the railroads or other companies proactive in monitoring when the chemicals are transported so they can avoid rush hour traffic?

A: Yes, Rohm & Haas knows when it is getting a railcar delivered. The fire department doesn't monitor railroad flow; I am not sure if other companies do.

Q: Are the plant's scrubbers operating?

A: There are chlorine scrubbers in each building where chlorine is used and they operate full time.

Q: Are the dikes earthen or concrete?

A: Concrete bottom and walls.

Q: How deep are the dikes?

A: The depth varies. They have to be high enough to contain the maximum amount of a chemical in a storage tank plus 10%. Dikes are usually 3-5 feet high and they are inspected on a regular basis. They are repaired whenever needed and drained after rain storms.

Q: How are they drained?

A: There is a manual drain valve built into the concrete wall. They are locked under normal conditions. If the dike has rainwater in it, the production operator will come out to make sure the water is just rainwater. He will then unlock the valve and the water will drain into the sewer. If the dike contains a chemical product, it would be pumped out and the trench would be cleaned.

Q: What is the large white tank on the cover of the RMP brochure?

A: That is the plant's own water supply in the event of a fire. About 20 years ago, it was doubtful that the city of Reading had enough water in its system to extinguish a fire if the plant ever caught on fire. It is a 100,000-gallon tank.

C: The water tank has a diesel-powered pump so that if the plant ever lost electricity, it could still pump water from the tank. It is tested every Monday.

Q: Is it possible for us to see the results of the tests the plant runs?

A: Yes. The plant runs its own tests, in addition to the fire department tests and outside agencies that come to the plant to test its emergency response systems.

Bethany asked the group if they wanted to skip one month during the summer. It was decided that there would be no CAC meeting in July.

Next Meeting

The next meeting will be June 14 from 6-7 p.m. in the same location. The topic will be remediation projects occurring at the plant.

The meeting adjourned at 6:50 p.m.



AGENDA April 19, 2001

Sign-In	All
Introductions	All
Membership Update	Bethany Dale
Steering Team Proposal	Bethany Dale
Plant Update	Bruce Beiser
Emergency Response & Notification Procedures	
 Rohm & Haas, Emergency Response Team 	Mack Vance
	Eric Walker
 Reading Fire Department 	Chief Kaiser
Questions & Answers About Tonight's Topic	All
Adjourn/Comment Cards	All



Cincinnati Facility

April 19, 2001 Meeting Minutes

Members Present

Bill Apking
Bruce Beiser
Debbie Goodhart
Jon Hopkins
Kevin Kaiser
Gene Koetter
Dave Lehrter
Margie Lehrter
Mike Rahall

Visitors

Karen Arnett
Suzie Bateman
Rachael Belz
Lt. Scott Snow
Barb Stall
Margie Stall
Wilma Stall
Mack Vance (presenter)
Marilyn Wahl
Eric Walker (presenter)

Facilitator

Bethany Dale

The meeting started at 6:00 p.m. in the Reading Municipal Building, located at 1000 Market Street. Members signed in and were given an agenda, Rohm & Haas Environmental, Health & Safety Update (Spring 2001), copy of the Rohm & Haas "Emergency Response Process" presentation, copy of the Reading Fire Department's "Emergency Notification" presentation and blank comment cards. Bethany Dale welcomed everyone and reviewed the agenda. Bethany reviewed the steering team's proposal to welcome visitors who reside in Reading. Bethany announced one change in membership; Rich Tennison from General Tool Company needed to withdraw from the CAC due to work conflicts.

Plant Update by Bruce Beiser

- Safety the plant had two first aid cases since the last meeting
- Environmental there were no reportable releases; there was a low pH deviation in the west sewer that exceeded the allowable time of 30 minutes (the deviation was 60 minutes in length)
- Incidents the plant had a contained fire in the tin metal melt tank; there were no injuries and no damage, the Reading Fire Department responded to the fire
- Regulatory Issues —

- The plant sent its annual air emissions inventory report to the Hamilton County Dept. of Environmental Services, Air Quality Management.
- The plant submitted a revised Risk Management Plan to the U.S. and Ohio Environmental Protection Agency. The revisions were based on organizational changes.
- The plant met with Metropolitan Sewer District on 4/12/01 to discuss past permit exceedances.

Other Activities —

- On 4/05/01, Bruce made a presentation to the Reading Board of Health regarding the plant's health and safety policies and procedures including accident history, workers' compensation history, employee medical surveillance program and worker health.
- The IT Corporation presented a report of technology options to reduce methyl chloride emissions. The plant is currently reviewing the options.
- Parsons Engineering submitted the results of its storm water retention study. The study included options for the plant to take to meet the Metropolitan Sewer District's request to reduce storm water flow to the sewers during a storm event.
- On 3/29/01, Bruce attended a joint meeting with representatives from the city of Reading, school administration and Chamber of Commerce.
- A security audit was performed at the facility. The plant is awaiting results.
- Phase I of the RCRA groundwater investigation is complete. There are 10 borings on the site and 24 groundwater monitoring wells. The study indicated that there is nothing from the plant seeping through the bank into the Mill Creek. A camera survey of the sewers is underway and soil samples have been taken.

Emergency Response & Notification Presentations

Mr. Eric Walker, Environmental, Health and Safety Engineer, and Mr. Mack Vance, Production Coordinator, from Rohm and Haas presented the plant's Emergency Response Process to the CAC. Their presentation included environmental release reporting forms, off-site incident reports, bomb threat checklist, odor control report, emergency response procedures, reportable quantities and the plant's evacuation plan. Chief Kevin Kaiser of the Reading Fire Department presented emergency notification procedures to the CAC. His presentation highlighted the city's emergency response planning process, evacuation decisions, shelter-in-place and the different methods of emergency notification. Copies of both presentations were distributed to all CAC members before the presentations were given. Please refer to these packets for a recap of the presentations. Extra copies are available from Bethany Dale for any members who missed the meeting.

Questions (Q) and Answers (A) & Comments (C) and Responses (R)

During/After Rohm & Haas Presentation

Q: Does the plant receive a lot of bomb threats?

A: The last bomb threat the plant received was about 15 years ago.

Q: What chemical is the vinegar smell related to?

A: Acetic acid.

Q: Do you keep the odor complaint forms?

A: Yes, they are kept on file.

Q: Even if you don't smell an odor, do you still keep the complaint on file?

A: Yes, all odor complaints are kept on file.

Q: Where are the odor complaint files kept? Are the files available for public review?

A: The files are kept in Eric Walker's office. The forms may contain confidential information, but copies can be made. Eric has been sending copies of the complaint forms to the Hamilton County Dept. of Environmental Services, Air Quality Management office.

Q: Do you get back to the person that files the complaint?

A: We try to get back to that person in 24-48 hours.

Q: When was the last time the plant had to fully evacuate?

A: During the Rosemont Industries fire last September.

Q: If you evacuate the facility, do the neighbors have an idea of the worst case scenario of what could happen to them?

A: The Fire Chief will talk more about community evacuation during his presentation.

Q: In the spill of October 1999, where 750 pounds of methyl chloride was spilled, did you (Rohm & Haas) have to suit up for that?

A: No, when methyl chloride comes out, it goes into the air. When a leak is detected, valves automatically shut-off. Usually methyl chloride isn't spilled, it is a gas that goes out. We don't suit up for a methyl chloride release but we will use the air packs if necessary. We will check the area with monitors to determine if we need the air packs or tyvek suits. Usually by this time, the methyl chloride is gone.

Q: The "Managing Chemical Risks In Our Community" pamphlet that the plant put out states that when methyl chloride gas is released it usually hugs the ground because it is heavier than air. It seems like if a release occurs it will hug the ground and go to the area where people are living. Does that mean people are breathing it?

A: The plant has continuous air monitoring instruments around the area where methyl chloride is handled. The instruments have alarms on them. The alarm is 25 parts per million, the OSHA acceptable level for short-term exposure is 50 parts per million. If the plant has a release, it would trigger the alarm. The level released would determine whether or not the air packs are needed.

Q: What about long-term exposure?

A: I believe the EPA's website lists the long-term acceptable exposure limit at 40 parts per billion. The "Campaign for Safer Neighborhoods" had that information as well.

Q: An odor complaint was given to the plant on March 7, on March 14 the plant sent a letter stating it couldn't determine anything. The letter wasn't mailed out until April 4, is there some reason the plant doesn't want to answer us quickly?

A: That was entirely my (Eric Walker) fault. The letter was typed and misplaced on my desk. We try to get back to people by phone within 24-48 hours after the occurrence. We weren't trying to hide anything from you; it was just a mistake.

Q: Are you going to respond by letters or by calling back?

A: Typically, I try to call back. If you prefer a letter, that is fine too.

C: We prefer both, but we want it in a timely manner.

During/After Chief Kaiser's Presentation

C: At the last meeting, we talked about Bernard Avenue evacuation and that put a bad taste in our mouth. I don't think it was intentional, but you made it seem like Bernard residents were low on the totem pole and other people would be considered before us.

R: I didn't mean to do that. Evacuation is a complicated issue. (school evacuation example mentioned here) It is a hard decision to make and we want to make sure we have the information to give to people before people start to react.

C: We know the fire department has to have evacuation plans and Rohm and Haas does too, it is a federal law, but what are you going to do for the residents on Bernard? We know you will call or go door-to-door. All I hear is what is already in place, this isn't what I was expecting to hear tonight.

R: We do have plans. In your handout, there are instructions about shelter-in-place or different instructions you will receive by door to door. What I am hoping to do down the road is tell people specifically how to shelter-in-place.

Q: When would you call an evacuation? I would like to know from Rohm & Haas what chemicals would trigger an evacuation, how would they tell us about it and how far away from it would we have to go?

A: That is the Fire Department's call to make. It all depends on the material. We use standards or guides depending on the chemical(s) involved. A lot of the chemicals at Rohm and Haas dissipate in the atmosphere and are gone by the time we respond.

C: But we want to know that.

R: That's where we get into the problem of determining how much to tell people and whether or not it will cause undue panic. Most of the time when we are called to their facility we are just standing there as a safety team. I don't think you really want to know every time we get called there for any problem. We get called there more for "nothings" than "somethings." In fact we get called there for "something" very seldom and I am thankful for that.

C: In the many years that we have been dealing with Rohm & Haas/Morton International and their Emergency Response Team, the quote was made, "When you see the fire

department leave, you leave too." We don't know if there is a really dangerous situation there if a whistle will blow or an alarm will sound or what. We have never had written information to follow.

R: Right now we are working with Rohm & Haas to get information to the residents on Bernard. We are setting up a hotline.

C: We would like a timetable, this has been going on for nine years. Could you come up with something solid for us within the next six months?

R: We are still working on it. In the event that something is going on, the fire officials will be making a decision as to whether or not to evacuate the area. You will not get evacuation information from this hotline number, that information will come directly from the fire department and will be very specific. The Fire Department tries to maintain accountability and give you answers. The Rohm & Haas hotline will be a way to address some of your concerns with what is happening on a regular basis. The hotline will be able to tell you what is going at the plant if you see fire trucks head down there.

C: The plant relies on the fire department to determine whether or not an evacuation is necessary. Can we make it clear as to what it is you want to know as far as what kind of information you want the plant/fire department to communicate to you?

R: We want to know what would happen and what we should do if it is a certain chemical. Do we stay indoors or do we evacuate, what if kids are playing outside?

C: There isn't a clear-cut answer to the question. It depends on the material and wind conditions. The plant and fire department work together to establish what the worst-case scenarios are and do preplanning so we know how to respond to them. Worst case scenarios don't just happen with Rohm & Haas, they include railroads and major roads, and these are some of the fire departments biggest concerns.

C: We just don't feel like we are being notified of anything. I am just now finding out about the spill at the Pristine site.

R: A lot of things have changed with the Right-To-Know act. People didn't use to be accountable for their actions. Many didn't know better, which is not a good excuse. We know what the Pristine site has cost the city of Reading.

C: We just feel like we should be told the truth. We know there is pollution everywhere. I don't know whether or not I am sick everyday because of Rohm & Haas.

Bethany requested that if anyone had other thoughts or questions from the evening to please write and then submit them. The meeting adjourned at 7:15 p.m.

Mission Statement

The mission statement votes have been tallied from March's vote. Here is the mission statement adopted by the members.

The Rohm and Haas Community Advisory Council works together to address the health, environmental and safety concerns of the plant and the community as well as develop

ideas on how the CAC can improve and support local programs and activities in the City of Reading.

Next Meeting

The next meeting will be May 10 from 6-7 p.m. in the same location. The topic will be an explanation of the plant's Risk Management Program submitted to the U.S. Environmental Protection Agency. The presentation will include a description of the plant's worst-case chemical release scenario assuming a catastrophic failure on all safety systems. An alternative or "more likely" scenario will also be presented.



Cincinnati Facility

AGENDA March 8, 2001

Sign-InAllIntroductionsAllMembership UpdateBethany DaleMission Statement VoteAllPlant UpdateBruce BeiserTRI PresentationRobin Cole

Program Overview

Cincinnati Facility's Reportable Chemicals & Quantities

Questions & Answers About Tonight's Topic All Adjourn/Comment Cards All



Cincinnati Facility

March 8, 2001 Meeting Minutes

Members Present

Bruce Beiser Carol Bullock-Carpenter Bill Ford

Debbie Goodhart

Greg Hilling

Jon Hopkins

Kevin Kaiser

Gene Koetter

Mike Rahall

Cheyenne Ritz

Earl Schmidt

Nancy Stall

Linda Stichtenoth

Facilitator

Bethany Dale

Visitors

Karen Arnett Suzie Bateman Rachael Belz Robin Cole Barb Stall Margie Stall Marilyn Wall

The meeting started at 6:00 p.m. in the Reading Municipal Building, located at 1000 Market Street. Members signed in and were given an agenda, sample mission statements, updated CAC membership list, a copy of the U.S. Environmental Protection Agency's Toxic Release Inventory Information Kit and blank comment cards. Bethany Dale welcomed everyone and reviewed the agenda. Members were asked to rank the mission statements from 1 to 3 in the order they liked best and turn in their votes at the end of the meeting. Members introduced themselves, and those that brought guests were asked to introduce their visitors. Bethany reminded members that CAC meetings are not open to the public and those who bring guests must inform her in advance.

Plant Update by Bruce Beiser

- On 2/06/01, Bruce made a presentation to Reading City Council regarding charges against the plant made by Ohio Citizen Action as part of its "Campaign for Safer Neighborhoods."
- On 2/08/01, Bruce responded to a letter received from the Environmental Community Organization and provided answers to 13 questions that the organization had posed to

- him. Copies of the letter and answers to the 13 questions were made available to CAC members at the meeting.
- The plant received a Recognition Award from the National Safety Council for going two years without having a lost-time incident at the facility. This was for years 1998-1999.
- On 2/13/01, the plant received recognition from the Reading Central Elementary PTO for its support of the school over the years.
- The plant received a "Notice of Proposed Fines" from the Metropolitan Sewer District (MSD) for the plant's self-reported permit exceedances for the year 2000. The plant had two oil and grease violations in August. They also had chloroform violations in August and November. The proposed fines from the MSD total \$21,600.
- The Reading Fire Department responded to an alarm at the plant on 2/18/01. The alarm tripped due to water flow from a sprinkler head in an unattended area of the building during the weekend. It was a false alarm due to a failed sprinkler head.
- On 2/22/01, the Reading Fire Department and Cincinnati Fire Department/Bomb Squad responded to the plant when an old, lab sample of a potentially, unstable chemical was found by plant personnel. The sample was five years old and contained 100 ml (or 1/10 of a quart). The Ohio Environmental Protection Agency granted permission to detonate the sample. Cincinnati Bomb Squad safely detonated the sample in an open field on the plant site.
- The plant received conditional approval for its "Proposed Work Plan for the Resource Conservation and Recovery Act (RCRA) Site Investigation." A copy of the work plan will be available shortly at the Reading Public Library.
- The plant celebrated Black History month in February. The plant sponsored an essay contest at two elementary schools in Reading with recognition for both students and teachers. Winners received monetary awards. The plant also had a celebration with visitors from other Rohm & Haas sites.
- The plant has gone five months since its last lost-time injury, which is any injury that requires more than first aid.
- The plant received a letter from the Environmental Community Organization with the
 results of their air modeling. The letter also requested confirmation of the permitted
 emission limit. The plant responded and copies of the response were made available
 at the meeting.
- The plant submitted its "Semi-Annual Compliance Report" for air permits P017 and P019 to the Hamilton County Department of Environmental Services for the last half of 2000.

TRI Presentation

The Toxic Release Inventory (TRI) presenter was Ms. Robin Cole, Environment, Health and Safety Manager of the Cincinnati facility. Folders containing copies of Robin's bio, her TRI presentation, and Material Safety Data Sheets for each of the seven TRI chemicals the plant reports were distributed to all CAC members before the presentation. Please refer to this packet of information for a recap of the presentation. Extra copies are available from Bethany Dale for any members who missed the meeting.

Questions (Q), Answers (A) & Comments (C)

Q: In Robin's presentation, all the chemicals released are listed in pounds except for methyl chloride, which was listed in tons. I just wanted to confirm you had 40 tons of methyl chloride released to the air. Did you say your permit for methyl chloride was 49 tons per year?

A: Methyl chloride is listed in tons because it is listed that way in the permit. Yes, the plant's permit limit is 49.1 tons/yr.

Q: I didn't quite catch Bruce's reference to the compliance monitoring report. Is that a quarterly report or a semi-annual report?

A: The plant does semi-annual compliance monitoring.

Q: Did you say your control efficiency was up?

A: Yes, our control efficiency is up and our emissions are down.

Q: If the methyl chloride scrubber had been operating for a full year, how much would it have recovered?

A: The amount of methyl chloride recovered is about 600,000 lbs (or 300 tons). The amount the plant emits is 40 tons.

Q: What about the gas membrane scrubber?

A: We aren't really sure, we never got that operating to the point where we were able to optimize it due to a manufacturing failure. There still would have been some emissions, even if it were operating properly.

Q: Is it possible to get it on-line again?

A: We are pursuing that with the manufacturer. We are also exploring other technologies.

Q: Do you have a timeline for when the new technologies will be installed?

A: No, not yet because we haven't identified what we will be using.

Q: Will there ever be CAC meetings open to the public?

A: Originally, the steering team agreed that visitors are welcome to come with a CAC member. This is something that can be voted upon if the group feels it is necessary.

C: We live on Bernard. All of this information is great. We want to be able to come without a member. All we want to do is find out the truth.

There was a brief discussion about some residents who live on Bernard Avenue stating that they never received invitations to join the CAC. Bruce told the group that all residents on Bernard were invited to be on the CAC. Bethany said she was aware of one residence not receiving a letter back in January and right after she was made aware of it a new letter went out.

C: It is alarming to live on Bernard and see all the fire trucks and bomb squad trucks go into the plant and not have any idea what is going on. I called the Reading Police Station who said they knew nothing and hung up the phone. Then I called a TV station who told me what was going on behind my house. That was very scary.

C: Regarding Rohm & Haas's response to the incident, the plant concluded that not informing the neighbors as to what was going on was an information gap. After the incident, the plant recognized that they should have put information on their emergency phone line for neighbors to call.

C: The sample was not a threat to anyone in the community. Reading's Fire Department responded to the incident first and determined it was a non-emergency. Cincinnati showed up with all the lights and sirens, which alarmed neighbors. The booms you heard were actually the detonating device used to disintegrate the material and disperse it.

C: The sample was safely detonated. As it turned out the sample was not unstable. Once the Reading Fire Department showed up, they were in control of the scene.

C: The city of Reading will try to make a better effort to communicate to the public when someone calls in and speaks to a police dispatcher. Dispatchers don't always know all the chemistry involved. There is only one dispatcher sometimes trying to answer 20 calls.

There was a brief discussion about emergency response procedures and evacuation plans. It was stated that incidents could be used as a learning experience to improve emergency response procedures.

Bethany asked for names and addresses of anyone who lives on Bernard Avenue that didn't receive an invitation to join the CAC. She mentioned that it might be something for the steering team to discuss.

If members who missed the meeting would like to vote on the mission statement, please contact Bethany Dale. The CAC mission statement will be announced at the end of next month's meeting.

Next Meeting

The next meeting will be April 12 from 6-7 p.m. in the same location. The topic will be Emergency Preparedness & Response for both the Rohm & Haas facility and the city of Reading. Mission Statement votes and comment cards were collected.

The meeting adjourned at 7:00 p.m.



AGENDA February 8, 2001

Sign-In Introduction of Members Introduction of Guests Explanation of CAC

All

Members who brought guests

Bethany Dale

Purpose

Review of mission statements and goals

Voting Procedures

New member discussion (Carole Koetter and Rich Tennison)

Future Topic Ranking

Overview of Rohm & Haas Facility

Bruce Beiser

Questions and Answers about Tonight's Topic

All

Adjourn/Comment Cards

All



Cincinnati Facility

February 8, 2001 Minutes

Members Present

Bruce Beiser

Carol Bullock-Carpenter

Bill Ford

Debbie Goodhart

Greg Hilling

Jon Hopkins

Kevin Kaiser

Gene Koetter

Dave Lehrter

Jim Pfennig

Cheyenne Ritz

Earl Schmidt

Donald Sorrells

Nancy Stall

Facilitator

Bethany Dale

Visitors

Karen Arnett

Suzie Bateman

Bo Bemmes

Rachael Belz

Robin Cole

Bridget Hardewig

Barb Stall

Margie Stall

Marilyn Wall

The meeting started at 6:10 p.m. in the city of Reading Municipal Building. Members signed in and were given an agenda, sample mission statements and blank comment cards. Bethany Dale welcomed everyone and reviewed the agenda. Members introduced themselves, told how long they had lived or worked in Reading and stated what they hoped to get out of the CAC. The members who brought guests were asked to introduce their visitors.

Purpose of the CAC

- Be constructive and professional, work together to develop open lines of communication
- Address environmental, health, safety and emergency response issues relating to the plant and the city of Reading
- Establish dialog between the community and Rohm & Haas on its operations and how the company can improve its communication with the community

Mission Statement

It was decided that the CAC would vote on the three proposed mission statements at the next CAC meeting in March.

Voting Procedures

Bethany explained that voting procedures had not been established yet. The question presented to the group was whether or not households with two members on the CAC should get one vote or two. It was decided that households with multiple members get only one vote. Bruce Beiser does not vote on issues because he is the plant manager.

Membership Update

Bethany informed the CAC they had lost three members - Catherine Hartman and Margaret and Phillip Benning. Two other community representatives expressed interest in joining the CAC after it was established – Carole Koetter, resident on Bernard Ave., and Rich Tennison, employee of General Tool Co. The CAC members agreed to accept these two candidates as new members. CAC members also decided that if additional members of the community want to join the CAC, then the CAC would decide whether or not to vote them in as members. If the CAC ever gets too big, then households with multiple representation will ask the non-voting member to step down as a listed member and become a visitor.

Summary of CAC By-Laws and Objectives Established

Bethany summarized the purpose of the steering team and summarized the CAC by-laws and objectives that were established at that meeting in January. All members were sent this same information in the mail on January 24, 2001.

Vote on Future Topics

Bethany passed out a list of future meeting topics that were proposed by the steering team. Eight topics were listed and members were asked to rank them from 1 to 8, with 1 being the topic they are most interested in and 8 being the least. As a result of the vote, it was determined that the plant's TRI chemicals and handling procedures will be the topic of March's meeting. Other topics will be addressed at future meetings. The final tally is attached.

Plant Overview

Bruce gave a 15-minute overview of the facility, including history, current operations, accident history, product line, permits and community activities. A copy of the facility's current fact sheet and a 50-year facility history brochure were available for anyone who wanted copies. Copies of these materials are available to anyone who missed the meeting.

Comments (C), Questions (Q) & Responses (R)

C: I would like to see Rohm & Haas address odor issues, overnight truck parking on West St. and cancer causing chemicals. The CAC was formed because of complaints by the neighbors.

R: The CAC was formed because Rohm and Haas requires each of its facilities to establish a CAC. The facility tried to form a CAC four years ago, but it did not work because issues were never resolved and there was no facilitator to keep the meetings on track. The plant has also been interested in forming a Reading Community Awareness Emergency Response (CAER) group, which has never formed due to lack of interest by other companies in Reading.

Q: It is my understanding that ETC is an environmental public relations firm and its main clients are chemical companies and waste disposal facilities. Based on that do you think this committee can be fair in dealing with the concerns of the neighbors?

A: Absolutely. ETC is a public communication company with chemical companies as clients as well as government agencies, such as the U.S. Environmental Protection Agency, cities and villages. The nature of work that ETC does makes them qualified to be fair and objective as a facilitator.

Q: Is this the only site that does what the Cincinnati facility does?

A: This is the only site that Rohm and Haas has that makes what we do. We have some competitors who make similar products.

Q: Why were some people who don't live in Reading excluded from the CAC? What is Rohm and Haas going to do about the truck parking issue?

A: The city does not want trucks parked on the city lot near the plant. Right now there are signs up that say "No Truck Parking." New signs will have to be ordered that state "No Truck Parking/Standing." The signs will be ordered and put up and enforced by the city of Reading. First time offenders will be issued a warning and second time offenders will be cited.

Q: What about trucks parking near the fence line at the stadium?

A: There are signs there that say "No Parking, City Vehicles Only." Rohm and Haas owns the street from the recycling dumpster on the city lot into the plant.

Q: Why does the plant allow 5-7 trucks to park on this street at night?

A: The plant has no confirmation that this many trucks park on the street at night. If someone has collected a list of trucks that park there, the plant would like to see it.

Next Meeting

The next meeting will be March 8 from 6-7 p.m. in the same location and the topic will be TRI. Comment cards were collected.

The meeting adjourned at 7:10 p.m.

Rohm Haas Cincinnati Facility CAC Vote Tally* on Future Topics

Voter A	TRI 2	Emergency Notification System in Reading	Remediation Projects at Plant	RMP 7	Odor Complaint Protocol	OCA/ECC Report or Citizen Auc
	2	U	0	,		7
В	3	2	NA .	4	5	1
С	1	2	3	4 .	NA	NA
D	1	5	6	2	3	7
E	1	3	5	2	6	8
F	1	3	5	2	4	8
G	3	2	4	1	6	8
Н	1	3	2	4	6	5
1	2	1	6	3	4	5
J	7	2	NA	4	3	1
K	2	3	5	4	6	1
L	4	1	2	8	3	7
M	2	1	6	3	4	5
TOTALS	30	31	50	48	51	60

^{*} Voters ranked the topics in the order they wanted to hear about them, with 1 being the highest priority and 10 be be the topics of the first few CAC meetings.

NA = voter did not rank this topic or provide other suggestions.



Community Advisory Council

August 26, 2004 Meeting Minutes

Members Present

Rachael Belz Carol Bullock-Carpenter Bud Elmlinger Bill Ford Chief Kevin Kaiser Joan Krimm Margie Lehrter Dan Milz

Visitors Present

Karen Arnett – Environmental Community Organization (ECO)
Beth Kaplan – Environmental Community Organization (ECO)
Melanie Lennon – Rohm and Haas, Safety & Industrial Hygiene Manager
Keith Mesch – Rohm and Haas, EHS Manager
Sandy Schoenberger - Rohm and Haas, Occupational Health Nurse
Mark Scott – Guest Speaker

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone, reviewed the agenda, and asked the CAC members and visitors to introduce themselves. Keith Mesch presented the plant update during dinner.

Note - Melanie Lennon, Safety and Industrial Hygiene Manager, Sandy Schoenberger, Occupational Health Nurse, and Keith Mesch, EHS Manager, are new to the plant's EHS department and will be attending meetings periodically. Karen Arnett requested that she replace Marilyn Wall on the CAC.

July and August Plant Update (Keith Mesch) Safety

• The plant had its first OSHA recordable accident after 11 months accident free. A mechanic suffered symptoms of heat stress while working outside wearing his personal protective equipment and a respirator. Reading paramedics responded.

No first aid incidents to report.

Environment

Sewer

No permit exceedances or deviations.

• Engineering work continues on the plant sewer rerouting/modification project. The project will reroute sanitary and process waste from the south sewer to the west sewer. The south sewer will be converted to storm water only. The Metropolitan Sewer District has sent approval letter to the Ohio EPA for issuance of the Permit To Install.

<u>Air</u>

No permit exceedances.

• Accidental release of 86 lbs of methyl chloride in July while unloading a 175,000 lb railcar. It was caused by an open vent. An operator saw the leak and shut the system down immediately.

RCRA Site Investigation

• Report to U.S. EPA is being prepared.

Odor Complaints

- The plant received six external and one internal odor complaint since the June meeting.
 - > 6/25/04 @9:10 a.m., rotten egg
 - > 7/28/04 @11:35p.m., ammonia
 - > 8/1/04 @7:28p.m., fishy odor
 - > 8/6 @2:55a.m., fishy smell
 - > 8/6 @2:45p.m., rotten egg
 - > 8/7 @9:40a.m., mercaptan

Odor Reduction Project

• The system continues to operate in Building 3/3A.

Methyl Chloride (MeCl) Emission Reduction Project

- Since March 1, MeCl emissions have been 4.1 tons (97.7% efficiency). Excluding June, the emissions were 2.5 tons (98.3%). June was the month of the equipment rebuild, start up, and shake down.
- The gas dryers are on site and should be operational in November. This will improve the reliability of the equipment.
- Second compressor train was rebuilt in July.
- The plant is testing the use of methyl chloride to cool the vent stream, which has shown a 50% efficiency. The cooling system is being set up on the second compressor train.
- Storage tank insulation is underway and will be complete by the end of the month.
- Plant is very confident that it will achieve the reduction to less than 10 tons per year of MeCl.

Early Truck Arrivals

• In the past 8 weeks, the plant recorded 5 early trucks. All arrived between 6:10 a.m. and 6:40 a.m. Two of the 5 were admitted to the plant on arrival (after 6:30 a.m.), the others were admitted at 6:30 a.m. as well.

Emergency Response Drill

- On July 21 and August 25, plant conducted an Emergency Response Drill. Plant simulated a leak from a railcar that required Emergency Response Team to respond. The drill included a full plant evacuation. Reading Fire Department observed and provided a critique of the plan and the response effort. 15 corrective actions were noted by the Fire Department. Chief Kaiser commented that the drill went well and the action items noted were only fine-tuning.
- Q: Where do employees go when they evacuate?
- A: During a Phase I evacuation, employees go to the locker room on the first floor. During a Phase II evacuation, employees leave the plant the direction they go depends on the incident location.

Community Relations

• Site contributed \$1,500 to the Taste of Reading Celebration.

• On July 15, plant hosted 3 high school students as part of the University of Dayton's Women in Engineering camp.

Community Announcements

• The Neighbor-to-Neighbor picnic will be held the first Sunday in October in Evendale. The event is free. There will be music, games and food for the whole family. Residents of Woodlawn, Deer Park, Reading, Lockland, Arlington Heights, Lincoln Heights, Amberly Village, Evendale and Blue Ash are invited. Rohm and Haas has donated \$250 to the event.

Emergency Warning System Presentation (Mark Scott)

Please see attached slides as a summary of Mark's presentation.

Presentation Questions/Comments

Q: How does reverse 911 work?

A: The 911 center can program a recorded message and automatically dial a group of telephone numbers (programmed by zip code or geographical area) at once and then relay that message. Residents would be called by the 911 center.

Q: What sort of role does the media play in public notification?

- A: The media needs to be educated, just like the public. A partnership with the media is important, but it can be hard to coordinate your efforts with the media. Misinformation about hazards and instructions to the public can be spread quickly, so you have to be careful. (The CAC discussed how the different TV channels handled the recent Queen City Barrel fire.)
- C: Companies need to be up front and communicate what the potential risks of facilities are to neighbors so they aren't surprised if something happens. The residents in Lower Price Hill had no idea what Queen City Barrel handled. The public's right to know this information far outweighs the potential risk of terrorists having this same information. Since 9/11, much of the community right-to-know information has been removed from websites.

The CAC is a mechanism to share the potential risks of the Rohm and Haas plant with interested neighbors. Monthly meetings are advertised in the Valley Courier newspaper and the community cable channel.

Q: What kind of releases does the plant have and where do the releases go?

A: Most are airborne emissions. Last month, our presentation was the plant's 2003 TRI data. Those meeting minutes are available on the website.

- Melanie Lennon distributed copies of the plant's EHS newsletter and magnets that provide the Community Update Line, 733-2250, and Odor Complaint Line, 733-2135. These telephone numbers were a direct result of the peroxide incident the plant experienced several years ago when the bomb squad and other emergency responders came into the plant and alarmed area residents.
- The Reading Fire Department has six lines dedicated for community emergency messages.
- Margie Lehrter commented that the door hangers the plant distributed notifying the community before its emergency response drill were very helpful. She suggested the plant provide regular updates about what's happening at the plant regarding EHS activities.
- It was suggested that Rohm and Haas make a presentation to the Sisters of Notre Dame regarding what the site manufactures, risks to the public and the safeguards in place to prevent incidents from occurring.

The meeting adjourned at 7:50 p.m.



Community Advisory Council

AGENDA August 26, 2004 6:00 p.m. — 7:30 p.m.

All

Sign-In and Introductions

Dinner All

Plant Update Keith Mesch

Community Issues Update All Announcements All

Presentation —Emergency Response Mark Scott

Notification And Community Warning

Systems

September Meeting Date Bethany Dale

Emergency Warning Systems

Presented to Rohm & Haas CAC August 26, 2004 Mark A. Scott

Overview

- Warnings save lives
- Success is measured by the actions people take
- Public warning is a local responsibility
- Effective warning requires a partnership
- Public warning is a system, not a technology

Key Elements of a Public Warning Process

- Collecting and analyzing hazard data
- Deciding to issue a warning
- Framing the warning
- Disseminating the warning
- Public reception
- Validation
- Taking action

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Steps in Developing a Successful Warning Strategy

- Planning when and how to issue warnings
- Educating the public
- Testing and evaluating the system

Lessons Learned About Effective Warnings

• There are many different "publics"

Who is the "Public"?

- People with many different levels of education
- People with many different levels of financial ability and responsibility
- People of all races and beliefs
- People with many different primary languages
- People with widely varying experiences with the hazard
- People with disabilities

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Lessons Learned About Effective Warnings

- There are many different "publics"There is no one best way to issue warnings
- People generally engage in rational action even when they are very frightened
 Occasional warnings that are not followed by an actual hazard are not "crying wolf;" BUT
 Systems should be designed to only alert and warn those at risk

- Withholding information is typically not in the public interest
- You can't have too much information, as long as it is accurate

Information needed

- What is the hazard?
- · Who and what is vulnerable?
- · What is the potential risk?
- What action should be taken?
- · Where can I get more information?

Factors to be Considered in Developing a Warning System

- Who are we trying to reach?
- · Where are they?
- · What are they doing?
- · Do they have any special needs?
- . What time of day is it?

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Warning Options	
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Knock on doors Mobile loudspeakers	
Outdoor sirens Emergency Alert System	
 NOAA weather radios Tone alert radios Electronic billboards and highway signs 	
Reverse 9-1-1	
 Fax messaging PDAs, pagers, other mobile devices Special receivers 	
Internet pop-up messages, email	
Points to Remember	
;	
There is no one best warning system	
AND	
AND	
 A warning system is no good unless people know what to do, and then do it 	

36 Things to Consider about Public Warning

(Source: Partnership for Public Warning, June 2004.)

- 1. Identify the appropriate actions that those at risk should take, as well as inappropriate actions that they might take based upon their experience with similar hazards. This is especially difficult but nonetheless vital when information is incomplete or there are conflicting recommendations.
- 2. Identify and plan for the incentives and disincentives for taking the alternative actions, as well as the constraints that prevent people from taking appropriate actions (e.g. people typically want to look out for their children or pets before they take action for themselves).
- 3. Develop programs to make sure the public can comply with recommended actions (e.g. if evacuation is recommended make sure there are buses or other transportation so those without personal vehicles can evacuate) and provide mechanisms for communicating the availability of these resources and programs to those who need them.
- 4. Recognize that "the public" is not a homogeneous entity. Households, businesses, government agencies, and non-governmental organizations vary in size, demographic composition, geographic location, and economic resources.
- 5. Identify and consider the ways in which population segments differ in their perceptions of the credibility of different sources, their access to different warning channels, their reactions to warning message content, and the incentives, disincentives, and constraints they are likely to experience in attempting to take protective actions.
- 6. Warning alerts must be distinct, attention grabbing, and not appear to be another common occurrence. Ideally the alert will provide an indication of the hazard threat level.
- 7. Provide individuals with the opportunity to test the system themselves. For example: Call a 1-800 number and have an alert message sent to their receiver only.
- 8. Be as specific as possible about the nature of the threat (e.g. explosive, chemical, nuclear/radiological, or biological), the anticipated impact location, and the expected time of impact. The general public and decision makers in business, government, and non-governmental organizations need to have as much information as possible so they can weigh the consequences of alternative actions (including inaction) before expending significant resources on protective measures.
- 9. Recommend one or more specific protective actions so that those at risk will know what they can to protect lives and property. Describe the hazard with sufficient specificity that it motivates people to take protective actions.
- 10. Explain to those who are *not* at risk why they are not believed to be at risk and why they do not need to take protective action.

- 11. Recognize that protective actions are most likely to be taken by those at risk when there is a *change* in threat condition. Develop a plan and systematic procedures for elevating and lowering the threat condition. The longer a given threat condition is maintained, the less effective it will be.
- 12. Use terminology in warning messages that is consistent across time for a given hazard and, to the greatest extent possible, compatible with the terminology that is used for other hazards. Avoid the confusion that can be created when similar terms or symbols have different meanings in different events (e.g. although school districts and the Homeland Security Advisory system both use a Code Blue, it means something different in each case).
- 13. Let people know when the threat has ended so they can resume normal activities as soon as possible.
- 14. Be prepared to disseminate specific warnings even if there is a high level of uncertainty about the threat because the information needed to reduce that uncertainty might arrive only shortly before the incident occurs. In such cases, casualties could occur because an official warning could not be received and acted upon in time by all of those at risk. The old saying "forewarned is forearmed" applies.
- 15. Do not withhold information because of concerns about "panic" (which is commonly anticipated by authorities but almost never occurs). If authorities do not provide information, people will seek it from other -- usually less reliable -- sources.
- 16. Repeat warning messages at regular intervals so those who missed an earlier warning will have another chance to receive it and those who ignored an earlier warning will have another opportunity to pay attention to it. Repetition also will give those who did not understand an earlier warning another opportunity to comprehend it and those who did not believe an earlier warning another opportunity to personalize it.
- 17. Update information when conditions change significantly so that people can adapt their responses to the new situation.
- 18. Identify all the communications channels to which different segments of the population have access. It is especially important to identify the channels that people monitor routinely, as well as those that can reach people rapidly during emergencies.
- 19. Use multiple methods and channels to disseminate messages. These include print and electronic media, the Internet, and even face-to-face presentations from credible original and intermediate sources.
- 20. Encourage people to tune to reliable sources of local broadcast news.
- 21. Recognize that no single source has complete credibility regarding all aspects of the threat and protective actions. Federal, state, and local government agencies vary in their credibility, as do news media, business, and nongovernmental organizations.
- 22. Identify in advance which organizations (and individuals within those organizations) will be responsible for communicating with those at risk, as well as with other population segments that are not at risk.

- 23. Identify procedures by which information from different sources can be combined to ensure that each individual source's messages are consistent with all other sources' messages and that, together, all official sources' messages are accurate, complete, specific, internally consistent, timely, novel, and relevant.
- 24. Recognize that source credibility can be established initially by credentials such as agency mission and educational degrees, but is enhanced by preparing objective ("transparent") procedures in advance rather than improvising during an incident, by obtaining endorsement by external experts ("peer review"), and establishing a satisfactory record of performance over time.
- 25. Build credibility and understanding that the warnings are based on the best available professional practice. Develop credible, articulate authorities to use consistently. Develop and utilize trusted personalities who the public know and respect. This is especially important for warnings of terrorism. Politicians are not credible authorities.
- 26. Even the most carefully designed warning system requires continual maintenance to ensure that it will be effective. Critical phases of maintenance include training, evaluation, and development. Core elements must be used every day.
- 27. Educate the public and provide for regular tests of the system tests in which the public can participate.
- 28. Provide training about the hazard and protective actions if those at risk must respond to unfamiliar situations. Be aware that few people will spend very much time and effort learning about a hazard before an incident occurs. Nonetheless, those who learn about the hazard and protective actions will have the necessary information to pass on to friends, relatives, neighbors, and coworkers, and serve as leaders within their local communities.
- 29. Adapt the scope of the training effort to the training motivation and capabilities of each target audience—personnel within emergency-relevant organizations, personnel within hazardous facilities (e.g. chemical plants), critical facilities (e.g. hospitals), critical infrastructure (e.g. ports), news media, and households.
- 30. Recognize that pre-incident planning and training will reduce uncertainties in actual emergencies, but improvisation will be necessary because events will differ in many ways from practice scenarios. Thus, training must be designed to promote adaptation and creativity rather than just rote response.
- 31. Make basic training about the hazard and appropriate response actions readily accessible to end-users, especially small business and households that cannot afford to hire specialized assistance in preparing for the threat.
- 32. Emphasize the common elements of emergency preparedness for all hazards. Emphasizing these common elements will enhance the transfer of training from one hazard to another. Moreover, significant expenditures of money, time, and effort will be more acceptable if the knowledge, skills, tools, and equipment can be used in response to multiple threats.

- 33. Actively promote continued evolution of warning system design to accommodate changes in hazard risk assessment, our understanding of the hazard and all its risks, communication technologies, and constantly changing demographic characteristics of populations at risk.
- 34. Recognize that one method will not reach all, and that an infrastructure is needed to support all channels.
- 35. Conduct careful pre-implementation evaluations to ensure that all new emergency response technologies meet user needs and are compatible with other systems in use.
- 36. Conduct post-incident and post-exercise assessments of all plans, procedures, staffing, training, facilities, and equipment so revisions can be made to improve response to future incidents.

MARK A. SCOTT

Mark Scott has twenty eight years of experience in government and nonprofit organizations, in the areas of environmental management, hazardous materials risk management, and community development.

For the last six years Mark has served as **President & CEO of the National Institute for Chemical Studies**, a national nonprofit organization focused on helping communities manage chemical risk. In this capacity he directed initiatives related to chemical plant safety and security; hazardous materials transportation risk assessment; public protective actions, including sheltering in place; emergency manager and responder training; communicating risk information to the public; and third party evaluation of local and state government risk management proposals.

In addition to his work with NICS, Mark served in several environmental regulatory positions in West Virginia state government, including as Chief of the state's water resources program and Deputy Director of the state Division of Environmental Protection.

In May, 2004 Mark left NICS to establish an independent consulting practice providing risk management and conflict resolution services to business and government.

Mark holds a Masters Degree in Urban and Regional Planning from the University of Pittsburgh, and resides in Charleston, West Virginia.



Community Advisory Council

October 9, 2003 Meeting Minutes

Members Present

Suzie Bateman
Bruce Beiser
Rachael Belz
Carol Bullock-Carpenter
Chief Kevin Kaiser
Curt Lambert
Jim Pfennig
Barb Stall
Margie Stall

Visitors/Guests Present Rick Gordon Sister Joan Krimm

Facilitator Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and reviewed the agenda. Dinner followed.

Plant Update (Bruce Beiser)

Safety

- No OSHA recordable injuries since last meeting. The plant has now gone 77 days since its last one.
- There was one first aid injury to an office employee when his desk chair broke and he strained his back.
- The plant had a small fire involving the insulation on a hot oil system. A pinhole leak caused heating oil to get into the insulation and it started smoking. The Reading Fire Department responded. There were no injuries.

Environment

Sewer

- There were no wastewater permit exceedances or reportable spills.
- The plant has requested a formal hearing regarding the last two Notices of Violation received from MSD in August and September, which were based on sampling from Feb/early March. The plant received a penalty notice from MSD for \$14,700, but is contesting it due to MSD's delay in reporting, analysis and investigation.
- Q: Have you looked at off-site sources as the possible cause of toluene in your wastewater since yours is stored under lock and key and nobody has checked it out of the locker?
- A: We reviewed MSD records for Rosemont to see if they had discharged toluene because sometimes sewers back up and can cause a reverse flow. We weren't able to find any references to toluene though. We're still at a loss as to the source of toluene. We have

had two sampling events since then with no detection of it. The rules say that MSD has to notify you of violations within 45 days. It took them 166 days to notify us, which is why we've requested a formal hearing.

Air

• There were no air releases or permit exceedances to report.

RCRA Site Investigation

• The plant submitted a new work plan to the U.S. EPA in May 2003 and is still waiting on a response back from the agency.

Odor Complaints

- The plant received three odor complaints (rotten egg or mercaptan) since the last meeting, all on September 18, 2003 between 4:50 pm and 7:20 pm. We consider this to be one event. The plant did not find anything abnormal in its operations. The wind was out of the north/northeast at the time.
- The plant continues to use biological treatment on its odor control scrubber.
- Q: Have the Lehrter's taken a sample using the canister provided by Hamilton County Department of Environmental Services (HCDOES)?
- A: No. Not that anyone knows of. Bethany added that she recently spoke to Kerri Castlen from HCDOES, who said the Lehrter's had not taken a sample yet.

Bethany also handed out HCDOES' newsletter that mentions the new air toxics monitor positioned at Cincinnati State on Reading Road in Evendale.

Odor Reduction Project

• Curt Lambert will be providing an in-depth odor reduction project update tonight.

Methyl Chloride Emission Reduction Project

- The new compressor seals continue to show improvement in recovery efficiency. Right now the average efficiency is 93%. If the efficiency rate stays at 93%, it would reduce methyl chloride emissions by about 20 tons/year.
- The capital stage gate process is progressing. We had a meeting and reached agreement to submit the request for capital in October for the compressor upgrade and overhaul, spare parts kit, installation of improved metering equipment, upgrade the venting control system from a pneumatic to an electronic system, and insulation improvements.
- The plant continues to do engineering work on the gas dryers and cryogenic chilling system. This additional work probably will be necessary to meet the 98% targeted efficiency of the system.

Early Truck Arrivals

- There were 9 early trucks in the past 4 weeks involving 6 different carriers. Four of the carriers were first time offenders.
- The earliest arrival was at 4:30 am, the rest were after 6:25 am.
- Craig Transportation (delivering empty containers) was the primary offender. They came early 4 times. Their supplier was told to fix the problem or find a new carrier.

Plant Security Upgrades

- The plant has started its security upgrade project. Poles are starting to go up for the security cameras and lights.
- Received a building permit to put in a new driveway for an employee entrance.

Plant Community Relations Update

• Donated materials for the Reading schools "Shelter in Place" buckets.

Community Update/Announcements/Questions

• Carol Bullock-Carpenter thanked the plant for making a donation to the "Getting To Know You Picnic" at Koenig Park. More than 500 people attended. The Reading Fire Department cooked food. The coordinators were disappointed that they didn't get any press coverage.

Chief Kaiser handed out the new Shelter In Place fact sheet, which was mailed along with the Shelter In Place magnets to parents of Our Lady of the Sacred Heart students. The high school environmental club is interested in helping prepare the Shelter In Place supply buckets for Reading Central School. The fire department will work with Reading High School, St. Pete's and Hilltop Elementary next. Evendale Fire Department has shown interest in the program now, so the Reading Fire Department will begin to work with them on outreach.

Odor Reduction Project Presentation (Curt Lambert)

Please see attached slides as a summary of Curt's presentation.

Q: Are the historical odor complaints on slide 2 just the odor complaints the plant has received?

- A: Yes. They do not include any complaints that Hamilton County Dept. of Environmental Services may have received over the years. Since we have our own odor complaint system, most (if not all) odor complaints are made directly to the plant and not to Hamilton County.
- Q: What do the neighboring odors from outside the Rohm and Haas plant smell like?
- A: Rosemont hot glue or plastic
 Cincinnati Drum could be anything because they burn up to 1" of product in drums
 Asphalt plant tar or hot asphalt
 Mill Creek –sewer odors
- Q: What is the cost of the odor control improvements for the process and fugitive sources?
- A: Just under \$500,000.
- Q: Is the plant confident its budget request will be approved?
- A: Yes. When we started this project we didn't think it would be this expensive. We are splitting the project over the end of 2003/early 2004 so we can spread the cost over two years' budget.
- Q: When will the new stack be built on Building 3?
- A: March 2004.
- Q: Will you ever get to zero odors?
- A: Our odors will be significantly less, but there will always be other contributing sources near our plant. Everyone has a different odor tolerance too.

New Members

Bethany informed the CAC that three of the CAC's recent visitors would like to officially be named members. They are Sister Joan Krimm (Mt. Notre Dame Convent), Dan Milz (Reading High School) and Rick Gordon (Electric Motor Technologies). The CAC gladly welcomed these three individuals as new members.

Next Meeting

Bethany informed everyone that the Nov. 13 meeting topic is scheduled to be: Preparation of the 2003 CAC evaluation, and a look at various emergency response systems (sirens, whistles, reverse

dialing directories, etc.) as presented by Marilyn Wall. However, Marilyn is unable to present that information next month.

Bethany proposed that she might be able to get that same type of information from the National Institute for Chemical Studies (NICS). The CAC was interested in hearing what sort of research NICS had done and Bethany agreed to follow up. Bruce proposed the new DOT security regulations as an alternate topic for November if we are unable to line up a speaker about emergency response systems.

POST MEETING MINUTE: A representative from NICS in West Virginia is interested in speaking to the CAC about different emergency response systems it has seen in use across the country and by different types of communities (i.e., chemical companies, Army bases). The representative would like to come to a meeting early next year to share his insights, either in January or February. So the November meeting topic will be related to new security regulations involving the transportation of hazardous chemicals.

The meeting adjourned at 7:40 p.m.



Community Advisory Council

May 8, 2003 Meeting Minutes

Members Present

Bruce Beiser
Bill Ford
Cheyenne Gill
Jon Hopkins
Margie Lehrter
Jim Pfennig
Sabrina Smith

Visitors Present

Eric Walker (attending for Curt Lambert)
Brittani Elfers (Reading student)
Zack Booth (Reading student)
Connie Booth
Christina Oliver (Reading student)

Facilitator Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and reviewed the agenda. Introductions and a plant tour followed.

Plant Tour

Eric Walker gave CAC members and visitors a pre-tour safety orientation. Two tour groups were formed— one led by Bruce Beiser and the other led by Eric Walker and Jon Hopkins. The plant tours lasted approximately 40 minutes. Below is a brief description of the areas covered on the tour.

- Product Display Case and Research Lab Stopped by display case to view Rohm and Haas finished products and end-use consumer products that contain chemicals/finished products manufactured by the plant. Briefly walked through the research and development lab.
- Buildings 11/12 Walked by the chlorine and methyl chloride railcars and proceeded in the Building 11 control room, where the rail car cameras and environmental monitors were pointed out. Tin, methyl chloride and chlorine are used to make an organotin intermediate in this area of the plant. Once outside the building, we walked past the methyl chloride recovery system. Plant engineers are working on reducing the methyl chloride emissions that are released from the current recovery system.
- Walked north along storage tank areas, maintenance area and new emergency response trailer. Containment dikes were pointed out along storage tank areas.
- Cincinnati Drum and Pristine Walked along the northern-most area of the plant, past the Pristine site and Cincinnati Drum, which could be seen on the other side of the plant's fence. Bruce discussed the groundwater recovery system that is under operation at the Pristine site.
- Building 16 Toured Building 16, which takes a liquid stabilizer and turns it into solid pellets (pastilles) on a conveyor belt. The pellets then get loaded into boxes for shipment.



Community Advisory Council

Cincinnati Facility

November 8, 2001 Meeting Minutes

Members Present

Sue Bateman
Carol Bullock-Carpenter
Bill Ford
Debbie Goodhart
Kevin Kaiser
Curt Lambert
Dave Lehrter
Barb Stall
Linda Stichtenoth

Facilitator

Bethany Dale

The meeting started at 6:00 p.m. in the conference room at the Rohm & Haas plant. Pizza was provided.

Environment, Health & Safety Update (Curt Lambert)

Air Releases

• The plant had a methyl chloride release that was less than the reportable quantity.

Safety

- The plant had no injuries during October.
- The plant underwent "Behavior Safety Sampling" in September and October. This is part of a corporate safety initiative that encourages employees to observe safety practices followed by other employees performing their jobs. The goal of the program is to learn safer practices by watching others and thus reduce worker injuries. Employees made several safety recommendations, which have been implemented.

Odors

• The plant is continuing with its four step "Odor Plan" to reduce odors. The four sections are:

- 1. Odor Source Survey The survey includes data collected by an employee team that gathered odor information from all areas of the plant during a 60-day period. It also includes information collected when odor complaints are called in, and the results of a 1994-1995 odor report conducted by an outside consultant. The plant is reviewing all of this data to see if any patterns exist and determine how best to address odors. The final report is being written and will be shared with the CAC when it is complete.
- 2. Ventilation Project—The ventilation in buildings 3, 3A, 4 and 4A is not adequate. The plant hired an engineering firm to recommend methods of increasing ventilation and decreasing odors. The engineer's report was forwarded to Rohm & Haas corporate where it is being reviewed.
- 3. Implementing Suggestions The plant has implemented suggestions made by employees during the odor source survey. For example, several old pumps with seals (that could cause leaks and odors) were replaced with pumps that don't have seals, thus eliminating a possible odor source.
- **4.** Cryogenic Chiller The plant wants to install this new equipment to significantly reduce its methyl chloride emissions. The plant is currently getting engineering specifications and quotes from different vendors. This equipment should be up and running in 2002.

Other

- As part of the plant's RCRA Site Investigation, sections of the plant's employee
 parking lot are being torn up to determine if there is any buried waste under the
 pavement.
- The plant had a scare when white powder was found in a coffee mug inside the janitor's closet. This was a suspicious material since the janitor does not use white powder. The plant contacted the fire and police departments. The material was double bagged and sent to a laboratory for analysis. The material tested negative for anthrax.

Community Update (Linda Stichtenoth)

- Linda distributed Rohm & Haas' corporate newsletter, *Formula*, which had a front-page story about the company's reaction to the events of September 11.
- The plant raised \$43,000 during its United Way campaign last month. The plant exceeded their fundraising goal and had an all around increase is participation over last year's campaign.
- As a follow-up to last month's meeting, Linda updated the group with a list of educational partnerships that the plant participates in. She shared a memo written to plant employees describing each of the following initiatives.
 - · Junior Achievement
 - Job Shadow Day
 - Head Start Sponsorship
 - · Reading High School After-Prom
 - Reading High School Scholarship
 - Black History Month Essay Contest
 - Teachers Industry and Environment Conference Sponsorship
 - Science Screen Report

- Reading High School Environmental Club
- During the past summer, the plant created cross-functional teams to evaluate the plant's security. The plant wants to make sure its employees and community members are safe and security at the plant is as tight as possible.

Working Group Update (Suzie Bateman)

(Background — The working group was formed independently of the CAC. Its members joined to specifically discuss truck parking, odor issues, health damaging air releases and emergency notification at the plant. The group meets about once a month. Meetings are facilitated by Ann Green under the direction of Rohm & Haas' corporate office.)

Trucks

- The truck parking situation outside of the plant before 7 a.m., and large semis driving down Bernard, was getting better but seems to have gotten worse again. Bruce sent a letter to the plant's vendors outlining the parking policy.
- Gene Koetter maintains a list of trucks that park outside the plant gate and travel down Bernard both are no longer permitted because the city has posted signs. Suzie was able to locate one of Gene's older lists. Chief Kaiser noticed that the truck parking is a problem between 4-6 am. Chief Kaiser is going to share this information with the police and have them patrol during this time. The police may be able to start ticketing the drivers now that the signs are posted.
- Food service trucks and FedEx trucks were noted driving up Bernard, although they really aren't a bother to CAC members.

Odors

- This is still a big concern. Margie Lehrter called in a complaint on Monday. It was a mercaptan smell. Suzie notices the plant's smell on Thursdays from her office in Evendale.
- The working group has called before and gotten no response on the odor hotline, although this seems to be getting better. The plant has done customer service training to help the boiler operators take the odor complaints more efficiently.

Shelter In Place

This was discussed in great depth at the last working group meeting. The group has been looking into different emergency notification systems. The working group would like to work on this project with the CAC.

Discussion of CAC Meeting Format (Bethany Dale)

As a result of Rohm & Haas' Louisville CAC visiting Cincinnati's, and comments made to Bethany, the CAC felt it needed to re-evaluate its structure. The following summarizes the decisions made related to the structure of meetings and membership.

Date

• Meetings will continue to be held the second Thursday of every month.

Time

• Meetings will be scheduled from 6-8 p.m., since one hour wasn't enough to cover most meeting topics. If we don't need all the time, we will dismiss early.

Location

Meetings will be held at the plant in the second floor conference room.

Dinner

• A light dinner will be served at meetings or members can bring their own dinner.

Issues Update

• The CAC is going to start an issues update at meetings. Community members will report to the CAC what they noticed during the month as far as truck parking, odors, health-related issues, etc.

Membership

• The CAC would like to send out letters to prospective members inviting them to attend meetings, join the CAC, or participate in the Shelter In Place education campaign. The letter could be signed by Bruce and Mayor Schmidt. Chief Kaiser will give Bethany the City's list of community contacts. Some of the suggested contacts include new council representatives, someone from every school in Reading, PTA leaders, Education Commissions, local doctors, Kiwanis, Evendale officials, Kids-R-Fun, Valley Courier, etc. Members were asked to provide names of any other individuals or groups they feel would be interested in serving on the CAC.

Shelter In Place Discussion

The CAC wants to undertake a community wide Shelter In Place education campaign. The fire department is responsible for communicating this information to all schools in Reading including both city elementary schools, junior/senior high, two parochial elementary schools and churches that have day care centers.

The CAC can really contribute in helping to educate the community. It was suggested the CAC schedule speaking engagements to educate the community. Some possible educational opportunities include: Kiwanis, Rotary, and PTO meetings; training the High School's Environmental Club who can in turn take the program to elementary schools; setting up a booth inside IGA on a Saturday, Lockland Days and Church Festivals. (The IGA might be able to print Shelter In Place messages on their paper bags or maybe put a flyer inside the grocery circular about when the CAC would be at the store to share information about Shelter In Place with shoppers.)

The Alliance for Chemical Safety has Shelter In Place videos, presentations, and some give aways (magnets, static decals, stickers and zipper pulls) that the CAC could use when educating the public. Education/notification cards might be good too. The CAC will look into what kind of give aways it should order at the next meeting. The CAC

wants to make a few sample kits to show during presentations or at information tables along with some give-aways and the Red Cross list of what should be included in a Shelter In Place kit.

Follow-up for the next meeting:

Bethany — draft letter for prospective new CAC members, ask Bruce and Mayor Schmidt if they would sign the letter, bring copy of Shelter in Place presentation, find out what items the Alliance for Chemical Safety is willing to provide Linda —pull advertising brochures together, talk to Bruce about a budget Kevin — help Bethany identify community stakeholders, look into Miami University video, try to get a calendar of community events where the CAC may be able to speak

The meeting adjourned at 8:30 p.m.

Next CAC Meeting

The next CAC meeting will be January 10, 2001 from 6:00 – 8:00 p.m. at the plant, in the second floor conference room. We will be discussing the Reading Shelter-In-Place community education campaign. We may need to form Shelter In Place sub-committees (publicity, give aways, scheduling speaking opportunities, recruiting community help, etc.)

AGENDA

- 1. Historical Odor Complaints
- 2. Sources of Odors
- 3. Quantification of Odors
- 4. Air Dispersion Modeling Existing Operation
- 5. Odor Control Strategies
- 6. Air Dispersion Modeling Projected
- 7. Timeline and Budget
- 8. Conclusions and Questions

1. Historical Odor Complaints

YEAR	Q1	Q2	Q3	Q4
2000	N/A	N/A	3	1
2001	2	10	17	3
2002	3	8	18	N/A
2003	9	7	11	tbd

2. Sources of Odors

- A. From Inside the Morton Facility
 - 1. Building 3/3A/4/4A Complex
 - a. Odor control scrubber.
 - b. Manholes.
 - c. Filters.
 - d. Drum and Tote Loading Arm Stations.
 - e. Surge Tank.
 - 2. Sewer
 - a. Manholes in various locations throughout plant.
 - b. Final outfall pit.

- 2. Sources of Odors (cont.)
 - B. From Outside the Morton Facility
 - 1. Rosemount (primarily styrene)
 - 2. Cincinnati Drum
 - a. Emissions depend on combustion temperature and retention time
 - b. Section 4.8 of EPA Document AP-42 (5th ed.): "...no feasible way of controlling the release of incomplete combustion products," and "...the elimination of open-air drum burning seem(s) to be the only control alternativ(e) immediately available."
 - 3. Asphalt Plant
 - a. Section 11.1-1 of EPA Document AP-42 (5th ed.) presents emission factors for about fifty separate pollutants from Hot Mix Asphalt Plants.
 - 4. Mill Creek (sewer overflow)

3. Quantification of Odors

- A. From Inside the Morton Facility
 - 1. This building houses four separate emission units, two of which may generate odors.
 - 2. OC Emission factors developed on 02/12/2002 and 08/26/2002.
 - 3. It is necessary to separate the individual components of the emission factors in order to quantify their impact.

- 3. Quantification of Odors (cont.)
 - B. From Outside the Morton Facility
 - 1. Rosemount (unknown)
 - 2. Cincinnati Drum (unknown)
 - 3. Asphalt Plant (unknown)
 - 4. Mill Creek (unknown)

- 4. Air Dispersion Modeling Existing Operation
 - A. Assumptions and Limitations:
 - 1. No published odor threshold data for mercaptans at issue.
 - 2. Use EPA-approved SCREEN3 modeling program.
 - 3. Conservatively assume emissions occur at discrete, overlapping hours.

4. Air Dispersion Modeling – Existing Operation (cont.)

B. At 150 meters:

- 1. Process Impact = 27 ppb
- 2. Odor Control Scrubber Impact = 20 ppb
- 3. Fugitive Impact = 3 ppb
- 4. Sewer Impact = 28° ppb
- 5. Total Impact = 78 ppb

C. At 500 meters:

- 1. Process Impact = 5 ppb
- 2. Odor Control Scrubber Impact = 4 ppb
- 3. Fugitive Impact = 1 ppb
- 4. Sewer Impact = 3 ppb
- 5. Total Impact = 13 ppb

5. Odor Control Strategies (see overheads for A. and C.)

- A. Process Impact
 - 1. Segregation of relief devices (rarely used) and vents (continuously used).
 - 2. Install eleven local ventilation hoods at strategic locations.
 - 3. Tie vents and hoods into 40-foot stack with high velocity discharge.
- B. Odor Control Scrubber Impact
 - 1. Process Engineers continue to optimize our processes.
 - 2. New effort underway to alter the vacuum pump operation in an effort to reduce the amount of mercaptans in the discharge.
- C. Fugitive Impact
 - 1. Upgrade general building ventilation with new fans and exhaust registers.
 - 2. Tie registers into 40-foot stack with high velocity discharge.
- D. Sewer Impact
 - 1. Bacterial treatment in sewer

6. Air Dispersion Modeling – Projected

- A. Assumptions and Limitations (same as for existing operation)
- B. At 150 meters:
 - 1. Process Impact = 1 ppb
 - 2. Odor Control Scrubber Impact = 3 ppb
 - 3. Fugitive Impact ≈ 0 ppb
 - 4. Sewer Impact = 28 ppb
 - 5. Total Impact = 32 ppb

C. At 500 meters:

- 1. Process Impact = 2 ppb
- 2. Odor Control Scrubber Impact < 1 ppb
- 3. Fugitive Impact ≈ 0 ppb
- 4. Sewer Impact = 3 ppb
- 5. Total Impact < 6 ppb

Odor Control Project Team

7. Timeline and Budget

A+C Process and Fugitive Impacts (Budget: ~\$460,000)

- 1. to-date: Evaluated preliminary designs and bids from contractors.
- 2. October 14: Request approval to submit AR.
- 3. October: Submit AR, write PO for long lead items and other materials.
- 4. November: Detailed design by selected contractor
- 5. December: Approve all POs.
- 6. January: Begin construction.
- 7. March: Complete construction.
- B Odor Control Scrubber Impact (Budget: to be determined)
 - 1. These are ongoing efforts. Timelines vary.
- D Sewer Impact (Budget: to be determined)

Odor Control Project Team

8. Conclusions and Questions

- A. Proposed design should reduce building's contribution by more than 70% (from ~10 ppb to <3 ppb) and the total contribution by more than 50% (from ~13 ppb to <6 ppb).
- B. Impacts primarily in the form of mercaptans (no "MAGLC").
- C. If impact was in the form of H2S, both the existing and the predicted impact would be below H2S's 238 ppb "MAGLC."
- D. Addressing surrounding odor sources are beyond the scope of this project. However, the conservative 13 ppb impact from existing operations suggests that surrounding sources contribute to neighborhood odors.



Community Advisory Council

** REMINDER **

The next Rohm & Haas CAC meeting will be held:

6 p.m. – 8 p.m.

Thursday, November 8, 2001

Rohm & Haas Plant, Second Floor Conference Room

We will be revisiting the CAC's by-laws, format, structure, etc. as a follow-up to the Louisville CAC's visit last month. We also hope to get an update from the Working Group. Since this is an aggressive agenda and it may take awhile to get through it, dinner will be provided at the meeting.

Please let me know by Tuesday, November 6 whether or not you will be attending the meeting. The plant remains under heightened security so I will need to leave the names of meeting attendees with the guard. Members who show up for the meeting without identification or pre-arrangements are likely to be turned away.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany@etc-online.com



Community Advisory Council

Cincinnati Facility

October 12, 2001 Joint Meeting of the CACs from the Cincinnati & Louisville Plants

Cincinnati Members Present

Sue Bateman Bruce Beiser Bill Ford Chief Greg H

Chief Greg Hilling
Kevin Kaiser
Dave Lehrter
Margie Lehrter
Cheyenne Ritz

Cheyenne Ritz
Barb Stall
Margie Stall
Linda Stichtenoth

Visitors

Curt Lambert (Cincinnati)
Marco Delgato (Cincinnati)
Lt. Scott Snow (Cincinnati)
Amy Jordon (R&H Corporate)

Louisville Members Present

Faustine Caldwell Katie Clore Phil Davis Jennifer Decker Lauren Claypool Helen Haskett Dan Hicks Sandra Carroll David Holt Lisa Holt Bill Hommrich Connie Hubbard Hartford Kaufman Karen Lucas Elaina Mills Cline Russell

Teresa Poggenbor Cline Russell Betty Ryan Jennifer Sheroan Jonathan Thomas Roxanna Trivitt

Facilitator

Bethany Dale

The joint meeting took place at Rohm & Haas' Cincinnati plant. It started with a tour of the Cincinnati facility at 5:15 p.m. The tour ended at 6:15 and dinner was served in the plant cafeteria. The formal meeting began at 7:00 in the second floor conference room at the plant. Information packets from both CACs were distributed.

Welcome & Introductions

Bethany welcomed the Louisville CAC and everyone introduced themselves.

Cincinnati Plant Update by Bruce Beiser Safety

- The plant had its fifth recordable worker injury for the year when a production operator strained his ankle.
- Higher security continues at the plant with an extra guard and stricter access control.

Environmental

- There were no spills or releases during the past month.
- The plant submitted a permit application to install a cryogenic cooler for methyl chloride. The application was submitted to the Hamilton County Dept. of Environmental Services.
- A draft plan for the storm water retention project was submitted to the Metropolitan Sewer District. A meeting has been scheduled next week to discuss the plan.
- The RCRA site investigation continues. The next phase will include excavation
 of the northwest corner of the parking lot to look for the alleged buried drums.
 This had been delayed until community use of the adjacent recreational field was
 concluded for the year.

Community

- With the assistance of the city, the plant erected three parking restriction signs along the road into the plant. The signs say "No parking from 10 p.m. to 7 a.m." The police will enforce the signs.
- All employees are undergoing training on the Employee Codes of Conduct. Before the end of the year all employees will also receive training on the Environment Health and Safety codes of conduct.
- The plant held its Junior Achievement training for employee volunteers who will work with the two Reading elementary schools.
- The first of two phone skills training sessions has been conducted for the boiler operators who answer the odor notification line.
- The plant's United Way campaign starts next week.

Louisville Plant Update by Phil Davis

- The plant, along with other local businesses, donated several thousand dollars worth of gloves, masks, respirators, etc. to send to New York to assist the rescue workers at the site of the World Trade Centers.
- Rohm & Haas will match employees' contributions to the Sept. 11 Fund.
- The Rubbertown Mutual Aid Association held meetings and advised its members on what to look for when opening packages.
- The Louisville plant has increased security around the facility. It has also increased lighting, trimmed trees back and looked into installing security cameras along its fence line along the Ohio River. The plant is also considering having employees wear id badges.

 The plant is undergoing labor union negotiations. The new contract is being voted on tonight.

At this point in the meeting, Elaina Mills, Teresa Poggenborg and Hartford Kaufman from the Louisville CAC, presented background information about how their group was formed, how they operate, set agendas, brainstorm, etc. They also presented a few examples of the community projects they get involved with, including "Paint the Town" and the "Cane Run Elementary School Mentoring Program." Teresa showed a video about the mentoring program.

(Please refer to materials handed out at the beginning of the meeting. Extra copies are available from Bethany.)

The meeting was opened up for general comments (C), questions (Q) and answers (A) for either CAC.

- Q: When you (Louisville) started your CAC how did you get people involved? What about inviting other communities? Do you have suggestions for how we can get more people involved in our (Cincinnati) CAC?
- A: Offer dinner at the meetings. Set up information booths at community events. Try to get a bigger presence in the community. Include a representative of every school. Try to get elected officials from the city, state, or county level. You could also ask organizations to nominate a member. The Louisville CAC has members that represent different organizations (i.e., neighborhoods, Chamber of Commerce, schools, clubs, fire departments.)
- Q: Has the Louisville plant ever conducted a community-wide project? Our CAC has talked about doing a Shelter-In-Place campaign. If you have ever done anything like this, how did you get started?
- A: The Louisville CAC was heavily involved with community-wide education when the plant wanted to install an incinerator on site. The Louisville plant is also part of a multi-company CAC. The Rubbertown CAC has a Shelter-In-Place mascot, "Wally the Wiseguy" who visits schools and community organizations and teaches people how to shelter-in-place. We really have never done a community-wide education campaign.
- C: If you have a message that you want to get out to the community, children in grades 1-4 are very effective. They want to come home and tell you what they learned.
- C: Our (Cincinnati) CAC may need to be reorganized. When we first developed, the plant representatives had one idea of how the group should operate, which was to address neighborhood issues and do community work which would benefit the community as a whole. Many of the community members were becoming involved to address their specific issues and really didn't care about the greater good of the community. We need to bridge that gap.

- C: We live on Bernard and have been smelling the odors from the plant for 10 years. We have heard all kinds of excuses but no one can tell us where the odor is coming from. Now we are worried about the health effects because many Bernard St. residents have died of cancer. All of the community activities are great, but that is not what we are concerned with. We go to the CAC meetings and we sit and we listen, but the odor problem does not get solved. The odor problem is getting better but it is not completely solved. Do you (Louisville) have odor problems?
- A: Yes, we have odor problems. We focus on many issues at once though. Change takes time. We smell the odors and we talk about them at every meeting. We have been fighting a hog farm for years because of its odors too.
- C: Our meetings (Cincinnati) aren't long enough to solve any problems. We are getting information and the communication is getting better, but our problem isn't solved.
- Q: Do you (Louisville) have a have an odor subcommittee?
- A: We work with the environmental committee. Maybe you (Cincinnati) could get a calendar and mark the days when you smell an odor. Track the odor from month to month. It should get better, but it is not going to go away over night.
- C: Our (Cincinnati) CAC needs to revisit its by-laws. We originally established them through a steering committee. One of the vocal members of that committee is no longer interested in being on the CAC. This meeting is helpful because we can look at what is working and what isn't working.
- Q: Do you (Cincinnati) have a committee that sets the agenda topics for the year?
- A: The steering team brainstormed topics and the whole CAC voted on them. We have stuck to that list.
- C: We have noticed a positive change since Rohm & Haas bought the Cincinnati plant. They are friendlier and share more information. It has taken a long time for this group to get together. I can see change but we just still have a lot of bitterness built up over the years. We still have a long way to go. It is good to hear that your (Louisville) group has some of these same issues and you are able to sit down and work on them.
- C: Part of the reason we (Louisville) have been successful is because we agree to disagree. We challenge the plant and don't always get along when it comes to some issues, but at the end of the meeting we shake hands.

Bethany adjourned the meeting at 9 p.m. by thanking the Louisville CAC for all of their input. She said the Cincinnati CAC should go back to the drawing board and re-group with new by-laws, changes in the meeting format and location, membership recruitment, etc.



Community Advisory Council

** REMINDER **

The next Rohm & Haas CAC meeting will be held:

6 p.m. - 7 p.m.

Thursday, September 13, 2001

City of Reading Municipal Building

The topic will be Shelter In Place, a recommended safety response to airborne chemical spills. A member from the Alliance for Chemical Safety will be leading the discussion. The discussion will include when and how to Shelter In Place, Shelter In Place kits and NOAA weather radios, which are now being used in Hamilton County to notify residents of hazardous material emergencies.

Please let Bethany Dale know by Tuesday, September 11 whether or not you will be attending the meeting. Also, let her know if you will be bringing any visitors.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany@etc-online.com



Community Advisory Council

Cincinnati Facility

August 9, 2001 Meeting Minutes

Members Present

Sue Bateman

Bruce Beiser

Carol Bullock-Carpenter

Bill Ford

Debbie Goodhart

Kevin Kaiser

Dave Lehrter

Michael Rahall

Nancy Stall

Barb Stall

Margie Stall

Linda Stichtenoth

Lilida Stici

Facilitator
Pat Esposito

Visitors
Eric Walker
Robin Cole
Lt. Scott Snow

The meeting started at 6:10 p.m. in Council Chambers at the Reading Municipal Building, located at 1000 Market Street.

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- The plant had its annual maintenance shutdown July 30 through August 3 during which extensive preventive maintenance work was completed. Inspections included the reactors, high voltage transformers, electrical switch gear, and boilers.

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• During the maintenance shutdown, a high pH deviation occurred in the west sewer. Wastewaters containing alkaline cleaning soaps and wastewater from the

odor control scrubber both entered the sewer during the maintenance shutdown when flow conditions were very low. At the time, the pH adjustment system was also down for maintenance and cleanout. This combination of events caused the pH in the sewer to temporarily rise to 10+. The pH deviation was reported to MSD and OEPA.

- Quarterly monitoring of sewers was completed over a period of 4 days during which wastewaters were tested for 43 organics, 7 metals, oil and grease, and vapor space organics. All were in compliance with Rohm & Haas's permit from MSD.
- Extreme flooding of the facility by the Mill Creek occurred on July 17 causing the plant to shut down for cleanup. Mud and debris from the Mill Creek were removed from the northwest corner of the plant.
- Samples are being collected from various areas around the plant as part of the RCRA Investigation. Also, a camera survey of the sewer system was completed during the maintenance shutdown.

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• The plant hosted 2 students from the University of Dayton Engineering College for one day in July, in support of the Women in Engineering Summer Camp.

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The new phone lines listed on the magnets were tested by the CAC during the meeting to find out how they worked. Linda had a speakerphone in the room, which she used to call both numbers. The group was satisfied with the demonstration. Bruce told the CAC that he plans to have the operators trained to better respond to calls, and he urged the group to call in whenever they have concerns about odors or other items.

Odor Control Update (Robin Cole)

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Robin told the group that plant personnel have been collecting detailed odor information since June so that they can better understand any correlation between internal process conditions and external odor complaints. This is being used to help locate odor sources in the process systems and to make changes to resolve the problems.

One change that is underway is a \$190,000 investment to relocate the ventilation exhaust to a higher elevation. This change will eliminate a source of fugitive odors at ground level, and move them to a location where they can dissipate more quickly into the air.

She explained that some chemicals are noticeable at very small concentrations that are well below the workplace health standards. These chemicals are sulfur compounds known as mercaptans that have a rotten egg odor. They are well known and sometimes used specifically for their characteristic odors (e.g. the warning chemical used in natural gas is a special mercaptan).

The point was made that the addition of the scrubber and other changes that have been made at the plant in recent years has greatly improved the odor situation for the neighborhood.

The discussion about odor control continued, with some CAC members asking about efforts to control other chemical odors such as ammonia. Some said they had heard that the scrubber was not working properly, or that it was not properly sized. Bruce replied that this was not true, and in fact, the scrubber is working as intended. Eric told the group that during recent maintenance, the scrubber was out of service for 15-20 minutes to change a pump, and a neighbor call came in at about that time to report odors in the air. Bruce said that when the scrubber is down, the process is down; the process doesn't run without the scrubber. The group expressed general confusion about the scrubber and exactly how it works. One member asked for clarification on exactly what process the scrubber controls, and Bruce explained that it actually controls two processes, both of which involve mercaptans. He further explained that the scrubber does not control any other chemicals used at the plant. One member commented that she still smells odors from the plant, usually late at night or early in the morning. Another member said that the odor problem is much better now than in the past.

Louisville CAC Visit

Pat informed the group that Rohm & Haas's facility in Louisville, KY also has a CAC, and they have asked to visit the Cincinnati facility in October to take a tour and meet with the Cincinnati CAC.

The CAC gave overall approval to the joint meeting, and agreed that a 2-hour tour and meeting program would be appropriate. The meeting would be scheduled in the early evening, and would include a light dinner for all. The CAC also approved exchanging this 2-hour meeting for the December meeting, due to the holidays.

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Bruce told the group that he would like for them to take on a special project to determine what type of emergency notification is needed to make neighbors feel comfortable. This will be addressed starting at the September meeting, when related information about the new weather radio chemical release warning agreement between Hamilton County and the National Weather Service will be discussed. Also, videotapes prepared by other groups showing how to "shelter in place" will be shown to the CAC at the next meeting.

Working Group

At the end of the meeting, one of the CAC members asked why there are two groups working on community concerns about the plant. A lively discussion ensued, during which a couple of members expressed their belief that more gets done in the working group. Bruce clarified that the working group is a subset of the CAC, focused on 3 4 very specific concerns. He also noted that the working group is supposed to be sending reports of their progress back to the CAC, although no one brought a report for this meeting. (One report was distributed at the June CAC meeting.) He also told the CAC that, when the working group had reached an agreement on their concerns, they'd be disbanded.

CAC member Sue Bateman, who participates in the working group, then gave a short discussion about their efforts to resolve the truck parking issue. Signage, police surveillance, and small trucks (like sandwich vendors) were briefly discussed.

The working group is scheduled to meet again on August 27th at 6:30. CAC members were invited to attend if interested.

Next CAC Meeting

The next CAC meeting will be September 13, 2001 from 6-7 p.m. in the same location.

The meeting adjourned at 7:15 p.m.



Community Advisory Council

Cincinnati Facility

August 9, 2001 Meeting Minutes

Members Present

Sue Bateman

Bruce Beiser

Carol Bullock-Carpenter

Bill Ford

Debbie Goodhart

Kevin Kaiser

Dave Lehrter

Michael Rahall

Nancy Stall

Barb Stall

Margie Stall

Linda Stichtenoth

Facilitator

Pat Esposito

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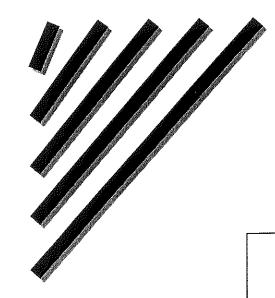
The meeting adjourned at 7:15 p.m.

Speaker's Introduction

Mark P. Hemingway

- Project Manager for Reading Investigation
- Principal Hydrogeologist for Geomatrix Consultants
- 17 Years of Experience in Investigations





Purpose of Presentation

Discuss

- * Investigation Objectives
- Investigation Scope
- * Investigation Schedule, Including When Findings will be Available



Potential On-Site Sources

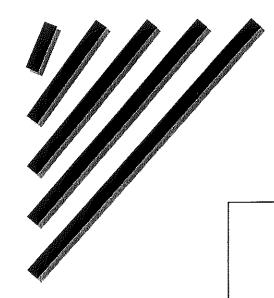
- * EPA identified 4 areas with "moderate to high potential" for causing contamination.
 - Old ponds, swale area, drum storage area, facility sewer
- * EPA also identified 3 former waste storage areas (above-ground tanks) that require closure certification.
- Morton identified 7 areas of reported waste burial.





- Facility rests on shallow clay soils with layers of sand (Upper Aquifer)
- Underlying the shallow clays and sands is a thick sand and gravel layer used in Mill Creek Valley for groundwater supply (Lower Aquifer)
- Lower Aquifer groundwater is locally captured by Pristine pumping system
- * A part of the Upper Aquifer groundwater is captured by a Morton pumping system.





Morton Interim Measures

Actions Already Performed to
Control Potential Causes of
Contamination

- Groundwater Collection
- Surface Soil Removal
- Closure of Impoundments



Investigation Objectives

General

"Ascertain the nature and extent of the hazard posed by the hazardous wastes or materials present at or released from the Morton Facility study areas."

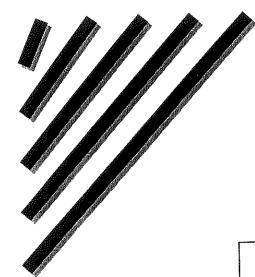
[from pp. 57 of the Administrative Order]



Detailed Objectives

- Is groundwater contaminated?
- If so, is its movement being controlled?
- Does any contamination pose a risk to workers, the local public, or the environment?
- If so, how does that risk compare with federal "acceptable" levels?

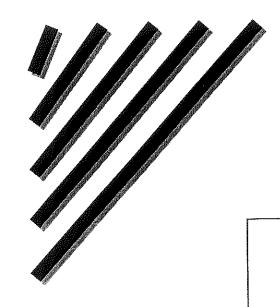




What does it take to answer those questions?

- Searches for buried waste materials
- Characterization of shallow groundwater system (nature of flow)
- Sampling of groundwater and soils
- Inspection & sampling of Mill Creek
- Evaluation of sewer system
- Understanding of background

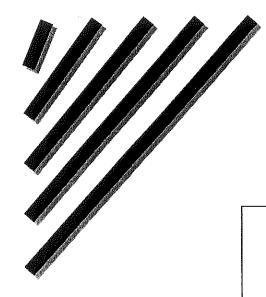




Environmental Investigation

- Planning Documents Started in Fall 2000
- Field Work Started in March 2001
- Field Work Completion Antic. In November 2001
- Final Data by January 2002
- Report on Findings due to EPA by June 2002

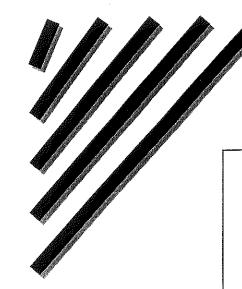




Investigation in Phases

- Phase 1 to Lay Basic
 Groundwork & Answer Some
 Fundamental Questions (Spring 2001)
- Phase 2 to Complete a More Detailed Picture (Summer 2001)
- Phase 3 to Fill in Any Gaps (Fall 2001)





Phase 1

- Deep borings w/ soil sampling
- Upper Aquifer wells
- Sewer camera survey
- Inspections of Mill Creek
- Geophysical surveys
- Plugging old monitoring wells
- Groundwater sampling





- Borings & Soil Sampling at:
 - Former waste mgt. areas (tanks)
 - Along sewer
 - Suspected waste burial areas
 - Former ponds & swale areas
- Installation of Addt'l Wells (if needed)
- Aquifer Testing
- Sediment Sampling along Mill Creek
- Ecological Survey





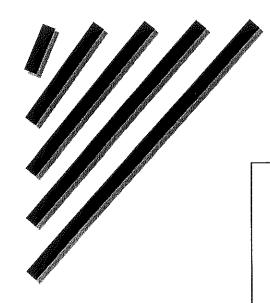
- Final Well Installation (if needed)
- Second Groundwater Sampling
- Any Other Remaining Work



Status of Investigation

- Phase 1 Field Work is Complete
- Some Phase 2 Activities Started in May 2001, Bulk of Activities are Currently Scheduled for July 2001 Start





Summary

- Investigation is Actively in Progress
- Anticipated Field Completion by End of 2001
- Findings and Conclusions to EPA by June 2002



Environmental Investigation of Reading Facility Objectives & Status

Morton International, Inc.
Reading, Ohio



Mirtha Capiro
Waste, Pesticides, Toxics Division
USEPA
DE-9J
77 W. Jackson Blvd.
Chicago, IL 60604

2 November, 2000

Dear Mirtha,

As per our phone conversation of 2 Nov, 2000, I am writing to notify you of my interest in following the investigation and corrective action, under RCRA regulations, of Morton International's releases of hazardous wastes. This is pertaining to the USEPA order of 18 August, 2000 with respect to Morton Int'l. I would like to request copies be forwarded to me, of any information pertinent to this investigation, including the USEPA order, the preliminary information provided by Morton Int'l, Morton's work plan for the investigation, USEPA comments on the plan, the revisions to the work plan, and findings of the investigation.

Please send correspondence to me at the following address:

Karen Arnett Environmental Community Organization (ECO) 515 Wyoming Ave Cincinnati OH 45215

513)761-4003 fax: 513)761-4988

c-mail: eco@env-comm.org

Thank you.

COVER SHEET:

To Mirtha Capiro

From Koren Arnett 513)761-4003 1/16/04

Neal A. Frink Dinsmore & Shohl, LLP 255 East Fifth Street, Suite 1900 Cincinnati, Ohio 45202-4720

RE: Freedom of Information Act Request RIN 1840-03

Dear Mr. Frink:

This letter is the Waste, Pesticide and Toxics Division's (WPTD) response to your Freedom of Information Act request received September 15, 2003, regarding the Morton International, Inc. site located at 2000 West Street in Reading, Ohio.

In your letter you made the following request:

"...I request that a copy be sent to me of all documents that pertain to the Morton International, Inc. Reading Facility, located at 2000 West Street, Reading Hamilton County, Ohio 45215..."

Since your original request, you have agreed to three extensions—the most recent one being January 9, 2004.

This response includes records covered by the Resource Conservation and Recovery Act (RCRA) within the custody of the WPTD. All releasable/responsive records were outsourced to a local copy service of your choice and copies were provided to you on October 20, 2003. A list of those records has been compiled and is enclosed.

All remaining records considered responsive to your request are enforcement confidential and are being withheld due to the following Exemptions under the Freedom Of Information Act: Exemptions 7(A): "records or information compiled for law enforcement purposes...the production [of which]...could reasonably be expected to interfere with enforcement proceedings." and/or Exemption 5 as "Inter-agency or intra-agency memorandums or letters which would not be available by law to a party other than an agency in litigation with the agency." Please see list of records withheld.

Under the FOIA, you have the right to appeal my denial determination to EPA, Office of Environmental Information, Records, Privacy, and FOIA Branch (2822T), 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. The appeal must be made in writing, and it must be received at this address no later than 30 calendar days from the date of this letter. The Agency will not consider appeals received after the 30-day limit. The appeal may include as much or as little related information as you wish, as long as it clearly identifies the determination being appealed (including the assigned FOIA request number RIN-1840-03), the date of this determination, my name, title and address as the Region 5 official making this initial denial. For quickest possible handling, the appeal letter and its envelope should be marked *Freedom of Information Act Appeal*.

The Air Division will respond separately to the other portion of your request.

A Bill for Collection is enclosed. The cost incurred by the Waste and Air Divisions in responding to this request is \$43.20. In your September 11, 2003, request, you agreed to pay charges not exceeding \$500.00.

Since the States within Region 5 are authorized to perform portions of the hazardous waste program in lieu of the Federal program, please contact the appropriate official listed on the enclosed sheet for additional information.

Please contact Ms. Terri J. Rancher at (312) 886-4188, if you have questions regarding this response. Please contact Mr. Thomas Nash, Associate Regional Counsel, at (312) 886-0552 if you have specific questions about the denial.

Sincerely yours,

Margaret Guerriero, Director Waste Pesticides and Toxics Division

List of Records Withheld RIN 1840-03 Morton International - OHD 000 724 138

Document Name	Exemption (s)
1) 10/8/03 E-mail from Mace Barron (BAH) to Mirtha Capiro (U.S. EPA) (1 page)	5 U.S.C. Section 552(b) (7)(A) 40 CFR 2.118(b) (7)(A)
2) 3/24/03 Draft letter from Phebe Davol (BAH)to Bernie Orenstein (U.S. EPA) Re: review comments (7 pages including attachments)	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A) Deliberative Process
3) 3/24/03 Final letter from Phebe Davol (BAH)to Bernie Orenstein (U.S. EPA) Re: review comments (6 pages including attachments)	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A)Deliberative Process
4) 3/14/03 letter from Phebe Davol (BAH)to Bernie Orenstein (U.S. EPA) Re: review comments (5 pages including attachments)	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A) Deliberative Process
5) 3/13/03 Letter from Kevin Luck (BAH) to Bernie Orenstein (U.S. EPA) Re: review comments (3 pages including attachments)	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A) Deliberative Process
6) 2/13/03 e-mail from Mace Barron (BAH) to Mirtha Capiro (U.S. EPA) (1 page)	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A) Deliberative Process
7) 11/7/02 letter from Phebe Davol (BAH)to Bernie Orenstein (U.S. EPA) Re: review comments (31 pages including attachments)	5 U.S.C. Section 552 (7)(A) 40 CFR 2.118 (7)(A)
8) 11/1/02 letter from Phebe Davol (BAH)to Bernie Orenstein (U.S. EPA) Re: review comments (28 pages including attachments)	5 U.S.C. Section 552 (7)(A) 40 CFR 2.118 (7)(A)
9) 6/29/01 e-mail from Todd Quillen (TechLaw) to Mirtha Capiro (U.S. EPA) Re: review comments (1 page)	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A) Deliberative Process
10) 6/22/01 e-mail from Michael Smith (TechLaw) to Mirtha Capiro (U.S. EPA) (1 page)	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A)
11) 6/22/01 e-mail from Michael Smith (TechLaw) to Mirtha Capiro (U.S. EPA) (3 pages)	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A)
12) 1/9/01 letter from John Koehnen (TechLaw) to Thomas Manning (U.S. EPA) Re: review comments (16 pages)	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A) Deliberative Process
13) 2/8/02 e-mail from Douglas Yeskis (U.S. EPA) to Mirtha Capiro (U.S. EPA) (2 pages).	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A)

14) 10/9/98 letter from Glenn E. Schaaf (Morton) to Gerald Phillips (U.S EPA) Re: Business Confidentiality Claim (2 pages)	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A)
15) 5/15/00 Draft RCRA §3013 Administrative Order for Morton (30 pages) and annotations affixed thereto	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A) Deliberative Process
16) 5/4/00 e-mail from Thomas Nash (U.S. EPA) to Mirtha Capiro (U.S. EPA) (1 page)	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A) Attorney-Client Privilege
17) 1/24/00 e-mail from Thomas Nash (U.S. EPA) to Michael Smith (U.S. EPA) (3 pages)	5 U.S.C. Section 552 (7)(A) 40 CFR 2.118 (7)(A)
18) 2/4/00 e-mail from Thomas Nash (U.S. EPA) to Mirtha Capiro (U.S. EPA) (1 page)	5 U.S.C. Section 552(b)(5) and (7)(A) 40 CFR 2.118(b)(5) and (7)(A)
19) 2/4/00 e-mail from Thomas Nash (U.S. EPA) to Mirtha Capiro (U.S. EPA) (1 Page)	5 U.S.C. Section 552(b)(7)(A) 40 CFR 2.118(b)(7)(A)
20) 2/9/00 e-mail from Thomas Nash (U.S. EPA) to Mirtha Capiro (U.S. EPA) (1 Page)	5 U.S.C. Section 552(7)(A) 40 CFR 2.118(b)(7)(A)
21) 7/8/98 Preliminary Assessment Visual Site Inspection report (w/photos) Prepared by TechLaw, Inc.	5 U.S.C. Section 552(7)(A) 40 CFR 2.118(b)(7)(A)

U.S. EPA - United State Environmental Protection Agency BAH - Booz Allen Hamilton



Sample Mission Statements

- The Rohm and Haas Community Advisory Council is a cross-section of community stakeholders working with the plant to develop and maintain effective, open and truthful lines of communication. The CAC addresses the health, environmental, safety and emergency preparedness concerns of Rohm and Haas and the City of Reading.
- 2. The Rohm and Haas Community Advisory Council works together to address the health, environmental and safety concerns of the plant and the community as well as develop ideas on how the CAC can improve and support local programs and activities in the City of Reading.
- 3. The Rohm and Haas Community Advisory Council is a voluntary organization of community representatives that address health, environmental, safety and other concerns of Rohm and Haas and the City of Reading. The CAC works together to provide feedback to the company on its operations and ways to improve communication with the community. It does this by having regular meetings, respect for each other and open lines of communication.



Cincinnati Facility

By-Laws

Mission Statement

The Rohm and Haas Community Advisory Council works together to address the health, environmental and safety concerns of the plant and the community as well as develop ideas on how the CAC can improve and support local programs and activities in the City of Reading.

Meeting Frequency & Date

Meetings will be held monthly on the second Thursday of each month.

Meeting Time

Meetings will be held from 6-7 p.m.

Meeting Location

Meetings will be held in the city council chambers of the city of reading Municipal Building, located at 1000 Market Street.

Meeting Format

Sign-in and pick up name tags

Welcome and review of meeting agenda 5 minutes Plant Update 10 minutes Speaker or Presentation 25 minutes Questions & Answers 20 minutes

Adjourn, return name tags, fill out comment/question cards

Tenure of Service

Members will serve on the CAC for a period of two years.

Member Replacement

If a member wishes to leave the CAC prior to the end of hi/her tenure, they will be asked to name a replacement. The CAC will decide if the replacement is suitable and determine whether or not the proposed individual is interested in joining the CAC.

Meeting Attendance

Members are asked to RSVP to each meeting. If a member has missed three consecutive meetings, the facilitator will contact the member to see if they are still interested in serving on the CAC.

Steering Team

The steering team is a small group of CAC members representing the interests of the full CAC. The steering team will meet on an as needed basis.

Meeting Cancellation

The monthly meetings will be held as long as at least 10 members have indicated their plans to attend, regardless of the actual number present when the meeting convenes. If fewer than 10 people commit to attend, the meeting will be cancelled for the month.

Visitors

CAC members are welcome to bring visitors provided they have notified the facilitator at least two days in advance. Residents living within the city of Reading are welcome anytime and do not need to be accompanied by a CAC member. Visitors can participate in discussions related to the topic of the meeting. If visitors disrupt meetings, the steering team will convene to address the issue.

Refreshments

Food will not be provided because meetings will only be hour in length. Members are welcome to bring snacks.

Meeting Minutes

The facilitator will take minutes at each meeting. Meeting minutes and other CAC information will be posted on the Rohm and Haas Cincinnati website: www.rohmhaas.com/cincy

For more information, please contact the CAC facilitator:

Bethany Dale

ETC, Inc.

31 Triangle Park Drive

Cincinnati, OH 45246

(513) 772-7903

bethany @etc-online.com



Cincinnati Facility

Please rank the following meeting topics in the order in which you would like to hear about them. We will set the agenda for next month's meeting based on the topic that receives the most votes.
Toxic Release Inventory (a U.S. and Ohio Environmental Protection Agency program requiring companies to report on releases of toxic chemicals into the air, water and land and the transfer of toxic chemical wastes for treatment, energy recovery, recycling or disposal at a separate facility)
Emergency notification system and procedures for the city of Reading
Remediation/cleanup projects occurring at the plant
Risk Management Plan (A U.S.EPA program that requires covered companies to submit plans describing their "worst-case" chemical release scenario, a "more-likely case" release scenario, five-year spill history for the chemical, safe practices employed by the facility, and emergency response coordination with the local fire departments)
Protocol on how the plant should and/or does respond to complaints when neighbors call the odor hotline
Ohio Citizen Action/Environmental Community Organization report on the findings of its Citizen Audit of the facility (public records review on air and odor issues at the facility)
Business and economics of the plant
Storm water – how the plant handles it and where it goes
Other Suggestions:

You are cordially invited to the

Ohio Citizen Action Community Awards Ceremony

Howard M. Metzenbaum Ohio Citizen Action Award

This annual award is the highest honor given by Ohio Citizen Action

Laura Rench

Dayton Activist

Outstanding Community Leadership Award
Citizens for the Responsible Destruction of Chemical Weapons
Dayton

Good Neighbors Award
Reading Fenceline Neighbors
Rohm & Haas Cincinnati

David Cochran Memorial Award

Karen Arnett

Cincinnati

ECO: Environmental Community Organization

Tuesday, December 7, 2004
6:30-8:30 pm reception
Civic Garden Center
2715 Reading Road
Cincinnati, Ohio 45206

Please RSVP to Ruth Breech at (513) 221-2100, rbreech@ohiocitizen.org or respond with the enclosed entry card by Friday, November 26, 2004.

Thank you.

A Special Thank you to our Friends and Sponsors:

Dave AltmanClifton Natural FoodsConscious CreationsMyra's DionysusBruce FrenchEllis JacobsMarie & Sam KocoshisJoe KorffKrogerWild Oats Natural MarketMarcia Wallgren

Community Celebration!



April 28, 2003

Bethany Dale ETC 31 Triangle Park Drive Cincinnati, OH 45246

Dear Ms. Dale:

Thank you for inviting me to attend the February Community Advisory Council ("CAC") meeting for Rohm and Haas. I enjoyed meeting and talking with those in attendance. During the meeting, several locations were recommended for the relocation of the Reading air toxics monitor. It is the intent of this letter to update the CAC on those locations and the progress of relocating the monitor. The three locations that were suggesting include Koenig Park, Neyer Properties, and Gorman Heritage Farm. Please find below a discussion of each of these properties:

- Koenig Park The site was investigated and it fails to meet the criteria because of the lack of a secure building to site the monitor and direction that Koenig park is located from Morton. This is an unfavorable site due, primarily that the park is located upwind (of prevailing winds) and we would like the monitor to be located in a downwind location from Morton.
- Neyer Properties A field visit was completed and met with Kelli S. Nicoloff. Neyer was not able to provide access for agency technicians to enter and leave the building as needed. In addition, there is not a way to get easy access to the roof or provide electricity needed to run the monitor.
- Gorman Heritage Farm A visit was made to the farm and we met with Sandra Murphey. Ms. Murphey was very interested in the idea and the educational opportunity that it may have presented. Ms. Murphey had an appropriate location on the property available, but needed to check with management before agreeing to putting the monitor on site. The Cincinnati Nature Center later recently notified the agency they had decided to close the farm in August of 2003. Ms. Murphey said she hoped to work with us down the road when the operations of the farm were worked out.

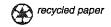
At this time, the Hamilton County Department of Environmental Services has decided to work towards putting the air toxics monitor at Cincinnati State, located at 10100 Reading Rd, Evendale. If you have any questions about this matter, or other concerns, please feel free to contact me at 513-946-7738. Thank you for your time and input into this project, we hope to continue to get and share information with the CAC in the future.

Sincerely,

Kerri Castlen

Permit & Enforcement Area Supervisor

Casten







AGENDA

May 8, 2003 6:00 p.m. — 8:00 p.m.

Sign-In

Introductions

Plant Tour

Dinner

Plant Update

Community Issues Update

Announcements

Relay For Life Update

Reading Jr./Sr. High School

Environmental Club

All

All

All

All

Bruce Beiser

Neighbors

All

Suzie Bateman

Cheyenne Gill & Students

The next CAC meeting
June 12



SHavely@rohmhaas.c om

06/13/01 03:33 PM

To: Mirtha Capiro/R5/USEPA/US@EPA

CC

Subject: Special Working Group at Cincinnati Facility

Mirtha-- Thank you for your phone call. I have arranged with Ann Green, who

is facilitating the special working group consisting of Ohio Citizen Action,

fenceline neighbors and the Cincinnati facility, to contact you and provide you meeting minutes and an invitation to attend the next special working group meeting.

The special working group grew out of Ohio Citizen Action's concerns and Rohm

and Haas' agreement that the issues raised by neighbors and OCA (reduction of

the plant's TRI methyl chloride emissions, minimizing mercaptan odors, stopping the practice of trucks parking overnight outside plant gates and implementing a community emergency notification plan) warranted a special "fast track" mechanism. The newly-formed CAC (formed in early spring) by itself, is probably not far enough along at this point to adequately address

and deal with these fenceline neighbors' concerns or OCA to either's satisfaction (hopefully, in time, it will be able). However, the special working group contains several CAC members as part of its group and the regular CAC is apprised and updated on the group's actions and progress on a

regular basis. I'm sure you can appreciate how these processes have to be carefully nurtured and the individuals involved trusted to be successful.

If you'd like more background or information, please give me a call. In the meantime, please expect to hear from Ann Green.

I appreciate your interest in the program and look forward to your participation.

Syd

Building 2 and Control Room — Where continuous tin mercaptide production occurs.

(Only Bruce's group stopped here.)

Building 3/3A and 4/4A (all one big building)— In this building, the organotin intermediate reacts with a sulfur-based compound to make a liquid stabilizer product. This is the main production building for organotins. It is also the location of the odor scrubber system. This building is the focus of the large-scale, exhaust stack ventilation project underway. In Building 4, tour guides pointed out the new design on the tote-filling equipment. This vacuum hose (shroud) should provide source ventilation while filling finished product into totes. This equipment is still under evaluation, but will hopefully reduce ground level odors.

After the tour, members returned to the second floor conference room for dinner and the remainder of the meeting.

Plant Update (Bruce Beiser)

Safety

• The plant continues the year without any OSHA recordable injuries.

• The plant had one near miss accident this month when an employee tried to lift a 100 lb bag and experienced muscle soreness.

• One first aid incident occurred when an employee suffered from heat stress while wearing an impervious Tyvek suit.

Environment

Sewer

There were no wastewater permit exceedances or reportable spills.

Air

• There were no air permit exceedances or releases to report.

• The plant received its final Title V air permit from the EPA. The application process had been going on for over two years. Title V acts as an umbrella permit bringing all other permits (storage tanks, reactor systems, etc.) into one large permit with federally enforceable regulations and guidance. For the plant, the significant areas covered by the new permit are the methyl chloride emissions and the steam boilers.

U.S. EPA Site Visit

• An inspector from the U.S. EPA Debarment Office visited the plant to conduct an audit. Another former Morton site in Moss Point, MS recently got into trouble with the government because an employee had falsified environmental reporting. As part of this settlement, the company signed a Consent Order with the U.S. EPA allowing other Morton sites to be audited to make sure they were in compliance. The Reading plant was selected as a follow-up audit because it was a former Morton site. Everything at the Reading plant was in compliance and there were no findings or issues. Morton remains on probation. The company has not been barred from doing business with the government.

Q: Did you know they were going to audit you?

A: Yes, we received a one-week notice that they were coming.

RCRA Site Investigation

- Bruce summarized that the RCRA site investigation was requested by the U.S. EPA to make sure that on-site plant contamination has not moved off plant property.
- The first quarter progress report was submitted to the U.S. EPA.

Odor Complaints

• There were no odor complaints called in this month. Bill Ford said he noticed a mercaptan odor a few weeks ago. Margie Lehrter added that her husband and Gene Koetter had noticed plant odors within the past few weeks.

Odor Reduction Project

• In early April, the plant switched from a chemical form of treatment (similar to bleach) on its odor control scrubber to a biological treatment. The biological treatment works by producing an enzyme that binds itself to the sulfur compounds, consuming the mercaptan odor. This alone will not solve the odor problems. Each bacteria injection into the scrubber system lasts 6 hours. The plant will resume discharging its odor control scrubber waste to the sewer system and hopefully the bacteria in the discharged water will help eliminate sewer odors as well.

• The manway hood design for tote packaging is still being assessed.

• Design on the new 40 ft. exhaust stack capitol project is moving along. It will disperse odors from buildings 3/3A and 4/4A into the air. This stack will cost about \$800K and should be operational in January 2004. The initial budget for the stack was \$350K. The stack will have two blowers (one is a built-in back-up) pushing the air upwards. Modeling shows the stack should reduce odors to below detection levels.

Methyl Chloride Emission Reduction Project

• This project is moving forward. News seals are being installed on one train compressor. This should reduce leakage around shafts. It will also reduce the nitrogen that is entering the system through the shaft, which reduces the efficiency of the methyl chloride recovery system.

Early Truck Arrivals

- 6 trucks arrived early since the April 10 meeting.
- There were 3 weeks in a row with no early trucks.

• Three of the early trucks arrived before 6:00 am.

• The plant took action on all occurrences and continues to work with suppliers and trucking companies.

Community Relations

• The plant made a donation to Reading Central Elementary School for carnival prizes.

• Bruce will be presenting the plant's scholarship to a Reading High School senior majoring in chemistry or chemical engineering. This is the third year for the renewable scholarship.

• Several plant employees (including Bill Ford and his two daughters) helped out with Reading's Annual Litter Clean-Up Day in April.

Q: Who is receiving the scholarship?

A: I can't say yet because that student will not find out until next week. I'll let you know at the next meeting.

Community Update/Announcements/Questions

- Bethany referenced one of the handouts, which was a follow-up letter from Kerri Castlen of Hamilton County Department of Environmental Services. The letter explained that a new location for the air toxics monitor in Reading had been selected — the Cincinnati State Workforce Development Center on Reading Road.
- Sabrina Smith mentioned that the Reading High School students are trying to organize a team for the June 13 Relay for Life event. Bruce reminded everyone that the CAC would be partially sponsoring the team organized by Suzie Bateman.
- Q: Curt Lambert mentioned that the plant has its own odor panel. Do you have one?

- A: The only one that I knew of was the internal odor panel that helped with the biological treatment option in the odor scrubber system. There is no standing odor panel here.
- Q: We have discussed emergency response before and then got into Shelter In Place without ever deciding on how neighbors would be notified of a serious incident at the plant. Could we revisit this issue? We live really close to all the chemicals back here and we are worried that we wouldn't hear anything if it happened in the middle of the night.
- A: Chief Kaiser has talked about the notification options before but that was over a year ago. The NOAA weather radios can now be activated to announce chemical emergencies. Maybe we could put this issue on the agenda for next month. We'll see if Chief Kaiser can tell us about the city's emergency response/notification plan.
- Q: How far away can the plant whistle blows be heard?
- A: It depends on the wind. The plant whistles are meant to be heard by plant employees not the community. You can occasionally hear them beyond the plant fence line.
- Q: We heard a really loud noise one Sunday evening and called the plant. Did you ever find out what it was?
- A: I think so. Apparently it was a piece of machinery in Building 27. The process that runs in that building used to operate in the day but due to staff reductions, it sometimes runs at night now. We have a capital project that we are working on to try to reduce noise in the plant, and that is one of the areas covered by that engineering project.
- Q: We haven't heard the noise since then and thought maybe you fixed it.
- A: Actually, that process hasn't run since that night. We can call you and let you know the next time we run that process so that if you hear it again you can call us and let us know.

Reading Junior/Senior High School Environmental Club Presentation

• Four students from the environmental club gave a Power Point presentation about the environmental club, the activities it supports and ways the CAC could get involved with the student club, which is sponsored by CAC member, Cheyenne Gill. (Please see attached copy of presentation for a full summary.)

Field Trips

- Data Chem
- Rumpke
- Ohio River Serpentine Wall
- Camp Kern team building

Other Activities

- Hiking trip
- Canoe trip
- Lock in (clean recycle bins, painted a classroom, made a bulletin board)
- School recycling program

Recycling Program

- Put a paper bin in every classroom
- Responsible for keeping bins clean and emptying them into large recycle bins outside
- Aluminum can recycle bins in lunch room

Fundraising

- Currently selling reusable canvas grocery bags for \$5. Elementary school students designed the bags. Every time you use your bag at Kroger's you get 5 cents back.
- Lunch time pizza sales throughout the year

How the CAC can work with the Environmental Club

- Shelter In Place booth
- Reading Clean-Up
- Field trip chaperones
- CAC recruiting booth (Academic Night is next week if the CAC wants to set up a booth and hand out information)
- Q: Has the Environmental Club ever done any wildlife studies along the Mill Creek? The plant recently reported to the U.S. EPA that a small school of carp was spotted in the creek. Plant employees have also seen geese on the athletic fields and a crane for the first time. It is nice to see wildlife again because the Mill Creek was reported as "dead" for so long.
- A: No we haven't yet, but there are a few groups that have offered to help us do things like that.

CAC Recruiting Update

- Bethany informed members that tonight's meeting was advertised in the Valley Courier newspaper for the past two weeks. Announcements will also be posted on ICRC City Cable.
- Informational letters will also be sent to approximately 300 residents, businesses, schools and other organizations as discussed at the April meeting. Nancy Stall assisted Bethany with the mailing list.
- Bruce mentioned that he is interested in making door-to-door visits to the residents on Bernard Ave.

The meeting adjourned at 8:00 p.m.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

FEB 0 2 2001

DE-9J

<u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Ms. Karen Arnett Environmental Community Organization 515 Wyoming Avenue Cincinnati, Ohio 45215

Re: RCRA § 3013 Administrative Order Morton International, Inc. U.S. EPA ID No. 000 724 138

Dear Ms. Arnett:

Thank you for your letter of January 11, 2001, regarding your interest in the investigation at the Morton International, Inc. (Morton) facility. In your letter, you indicated that you have not received a copy of any preliminary plan for the Morton facility. Also, you have listed various questions concerning the Administrative Order for Morton. Below I am addressing those aspects of your letter. As you may be aware, I spoke to Ms. Marilyn Wall from your organization during your absence concerning my preparation of a formal response to your letter.

As I previously indicated to you, U.S. EPA has received from the Rohm and Haas Company (Rhom & Haas) a November 2000, Facility Investigation (FI) Work Plan for the Morton facility. At the time we spoke, I suggested that I would arrange for Mr. Peter Palena from Rhom & Haas to send you a higher-quality copy of the work plan (including, e.g., diagrams in color). After some follow-up, I have confirmed with Mr. Palena that he had spoken to you and offered to mail you a copy of the work plan. Please inform me if you have not received a copy of the work plan from Rohm & Haas by this time. In addition to the above discussion, I learned from Mr. Palena that Rohm & Haas is in the process of organizing a public relations committee for the Morton facility.

The following are responses to your questions:

Question 1) What is the formal difference between an Administrative Order on Consent and an Administrative Order? I notice the change from one to the other in the process of going from draft to final document. What are the implications in enforcement?

An Administrative Order on Consent (AOC) is an administrative order to which the facility agrees and consents, voluntarily agreeing to do what the Order requires.

The requirements of a Unilateral Administrative Order, such as the one issued to Morton, are imposed unilaterally, without consent. Both kinds of documents are Orders which properly exercise U.S. EPA's authority and are therefore enforceable instruments.

Question 2) The final order is requiring a study, but no corrective action. In the AOC draft, I notice requirements for corrective action to "control unacceptable exposures", and to undertake corrective measures necessary to protect human health and the environment from all current and future risks. Is there an intention to require such corrective action after the two-year period?

U.S. EPA can take additional enforcement actions against Morton to require the implementation of appropriate remedies for the site if such actions appear to be warranted by the results of the investigation.

Question 3) There was a provision in the preliminary draft for a public comment period on Morton's proposed corrective measures. Did such a public comment period occur, and if so, what were the dates?

No public comment period has occurred. Section VI, Paragraph 18 from the proposed AOC indicated that U.S. EPA was to open a public comment period upon Morton's proposal of a final corrective measures. Morton cannot realistically propose a remedy for the site at this time due to the lack of investigative data from the site. When and if final corrective measures are proposed for the site, U.S. EPA will hold a public comment period.

I would like additionally to request any document which have been added to your files in the past month.

Refer to the enclosed copy of a U.S. EPA's January 30, 2001, letter to Mr. Palena of Rohm and Haas with comments on the FI Work Plan for the Morton facility.

If you have any further questions, please contact me at 312/886-7567 or at <u>capiro.mirtha@epa.gov</u>.

Sincerely yours,

Mirtha Capiro

Enforcement and Compliance Assurance Branch Waste, Pesticides and Toxics Division

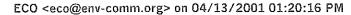
Enclosure

cc: Harold O'Connell, OEPA Amy F. Bohler, OEPA

Thomas C. Nash, C-14J

Peter Palena, Rohm & Haas

Mark Hemingway, Geomatrix Consultants, Inc.





To: Mirtha Capiro cc: Marilyn Wall, Gene Koetter, Rachael Belz

Subject: questions re: Morton/Rohm & Haas RCRA Administrative Order



a community and environmental network creating solutions to protect and improve health, welfare, safety and the environment

April 13, 2001

Ms. Mirtha Capiro

Project Coordinator/Manager

Waste, Pesticides and Toxics Division

Dear Mirtha,

I am writing in reference to the Morton RCRA Administrative Order # 000 724 138. I have seen

Morton/Rohm & Haas' Work Plan revision #01 of Feb 2001. Please inform me whether this is the most current revision, or if there have been subsequent revisions. I also want to request any subsequent correspondence between EPA and Morton/Rohm & Haas on this matter.

I am also curious as to whether communities adjacent to the site, such as Lockland, Glendale, and Wyoming, which draw their municipal water from the same aquifer, have been notified about the preliminary findings or will be notified as to the findings of the study underway? The work plan indicates a high level of uncertainty as to the extent of contamination of the deep aquifer by chemicals originating on the Morton/Rohm & Haas site. Whether or not a finding of human health risk occurs, it seems ethical to notify the affected communities of this possibility.

One other matter: I have made a FOIA request to CERCLA for reports on accidental air releases over the past years. I was denied access to reports made on air releases, on the ground that such a release of documents to the public could interfere with the current investigation. I do not see how air releases are in any way connected with the RCRA study. Could you tell me your impression on this denial of access to public documents?

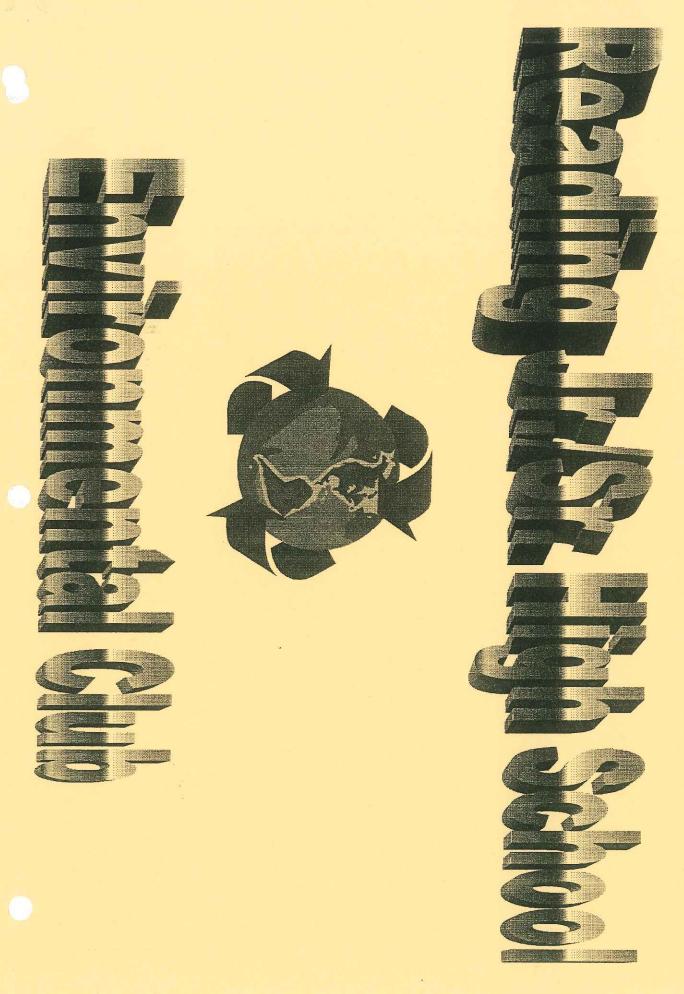
Thank you in advance. I look forward to your reply.

Sincerely,

Karen Arnett

Environmental Community Organization

environmental community organization 515 wyoming ave cincinnati, ohio 45215 ph: (513) 761-4003 fax: (513) 761-4988





September 12, 2002 Meeting Minutes

Members Present
Carol Bullock-Carpenter
Bill Ford
Tim Hoerst
Jon Hopkins
Chief Kevin Kaiser
Curt Lambert
Margie Lehrter
Dave Lehrter
Jim Pfennig
Cheyenne Ritz
Nancy Stall
Linda Stichtenoth

Facilitator
Bethany Dale

Member Discussion

Linda Stichtenoth informed the CAC that one of its members recently made a serious threat against Bethany Dale. She explained that Rohm and Haas has a zero tolerance policy for threats. As a result, this individual member will no longer be allowed on plant property. If CAC meetings are held at the plant, this individual will not be able to attend, even as a guest of another member.

Plant Tour

The meeting was held at the Rohm and Haas plant in Reading. It started at 6:10 p.m. in the cafeteria. Curt Lambert gave members a pre-tour safety orientation. Members divided into two tour groups — one led by Curt Lambert and the other led by Bill Ford and Jon Hopkins. The plant tours lasted approximately 40 minutes. Below is a brief description of the areas covered on the tours.

Buildings 11/12 — Tin, methyl chloride and chlorine are used to make an organotin intermediate. The tours went by the chlorine and methyl chloride railcars and proceeded in the Building 11 control room. This area is the subject of the methyl chloride emission reduction project.

• Buildings 3/3A and 4/4A — The organotin intermediate reacts with a sulfur-based compound to make a liquid stabilizer product. Building 3/3A is used for batch production (as opposed to continuous production). It is also the subject of the ventilation project. Building 4/4A is where the liquid product is packaged into drums and totes.

• Building 16 — Takes the liquid stabilizer and turns it into solid pellets on a conveyor belt. (Note: only Curt's group went here.)

Cincinnati Drum and Pristine — Walked on a road to the northern-most area of the

plant. These companies could be seen on the other side of the fence.

• Building 2 and Control Room — Where continuous tin mercaptide production occurs. (Note: only Bill and John's group went here.)

• Research Lab (Note: only Bill and John's group went here.)

After the tours, members met in the second floor conference room for dinner and the remainder of the meeting.

October & November Meeting Dates

The CAC discussed changing the October and November meeting dates.

The topic for the October meeting is sustainable development and Responsible Care. The presenter will be Kathy Maher, from Rohm and Haas' corporate environmental, health and safety office in Philadelphia. The meeting date had to be changed to accommodate travel schedules. The October CAC meeting will be held on Thursday, October 24.

The originally scheduled November meeting also had to be changed due to a conflict in Bethany's schedule and the new October meeting date. The topic for November will be an evaluation of the CAC and agenda setting for 2003. The November meeting will be held Thursday, November 21.

Both meetings will be held from 6:00 – 8:00 p.m. in the plant's second floor conference room.

Reminder, there will be no December meeting.

Announcements

• The American Cancer Society's Relay for Life will take place again next June at Reading Stadium. Suzie Bateman is on the planning committee and would like the CAC and other Rohm and Haas employees to form a team for the Relay. Sign ups will be in March.

• Carol Bullock-Carpenter announced the "Getting To Know You Picnic" will be held Sunday, September 29 from 2:00 – 4:00 p.m. at Koenig Park. The picnic idea originated with the community meetings that occurred after the 2001 riots in downtown Cincinnati. Reading is hosting the picnic and Amberly Village, Lincoln Heights and Lockland are on the planning committee. The communities of Arlington Heights, Blue Ash and Evendale have all been invited to the picnic. There will be food, music, face painting, a ventriloquist, magic shows and story telling for children. A different community will probably host the picnic next year.

Plant Update (Curt Lambert) Safety

- The plant had operated almost 11 months without a lost-time injury. Then, on August 16, an operator received a steam burn on her leg when her pant leg got caught on a pressure relief valve handle.
- There were four false fire alarms due to a problem with a smoke detector.

Q: Where the false alarms all from the same smoke detector?

A: Yes. The alarm company was notified that the smoke detector was going off. The alarm company continued to send the alarm signal even though they weren't supposed to. It was frustrating for the fire department as well as the plant.

Environment

Sewer

There were no wastewater permit exceedances since the last meeting.

• On August 22, the plant received a Notice of Violation for a low pH that occurred in the south sewer on May 29. The permitted pH level is 6 and it dropped to 5.5 for less than five minutes. (POST MEETING MINUTE: The Notice of Violation was issued by the Metropolitan Sewer District.)

Air

- There were no air permit violations, exceedances or non-reportable releases during the past month.
- A bleach odor was generated when the plant added bleach to a tote of wastewater at the west end of the plant.

Odor Reduction

• Curt reported the plant had received six odor complaints since the last meeting. The odors were described as "rotten egg" or "mercaptan."

• August 27 5:50 p.m.

• August 28 10:20 p.m.

• August 29 2:44 p.m.

• August 30 10:10 a.m.

September 8
 September 9
 2:50 p.m.
 4:10 p.m.

- Margie Lehrter reported that she has logged 18 odor complaints since August 25. Of those, she called 11 of them into the odor complaint line. Margie said July 4 and September 11 were horrible days for odors. She added that the boiler operators were not doing a thorough job of taking her calls anymore.
- Curt said the discrepancy between the 6 complaints the plant logged and the 11 Margie called in could be due to the boiler operators not logging the calls in properly, the plant not tracking multiple complaints on the same day, or the information given to Curt was not updated through the actual date of the meeting. He emphasized that he will make Bruce aware of the discrepancy.
- Curt said two common events occurred during the six odor complaints he knew about.

1. Kettle 310 in Building 3/3A was reacting under a vacuum.

- 2. The pressure relief filter was blowing, meaning air was blowing through the cake that contains the malodorous compound.
- Curt explained there were two general sources of odors, those that occur inside a building and those that occur outside. The plant has a project that should help each odor source.

Outside Odors

Outside odors come from the sewers. The plant has a new ester project aimed at addressing that source. The ester process has been implemented and is undergoing troubleshooting right now. The sewer odors should get better as the ester project moves along successfully.

Inside Odors

The plant is trying to improve the general building ventilation of Building 3/3A, by using a dispersion technique that will change the way air from inside the building is dispersed outside. The ventilated air will be pushed up into outside air at a higher elevation above the building. This will keep odors away from ground level where they may be noticed more frequently. Air dispersion is a widely used technique.

A second method of ventilation is "spot ventilation." Spot ventilation is similar to an overhead vacuum that will pull the air from that particular area and push the air outside through a stack. Scheduled completion of these projects is April 2003.

Methyl Chloride Emission Reduction

• This was formerly known as the cryogenic chiller project. The data package for the four-week characterization study of temperature, composition and pressure was received and evaluated. The data collected was contrary to the study previously done by the IT Corporation. The data indicated the need for one more confirmation study, which the plant did. This data verified the most recent study. A report is being prepared. Inert gases were discovered in the methyl chloride gas stream. The data revealed about 10% nitrogen is present in the gas stream.

Community Relations

• The plant held a remembrance memorial on 9/11 with a moment of silence at the site. Everyone was given ribbons to wear.

• The annual blood drive was also held on 9/11. Employees donated 29 pints of blood.

The plant continued with its annual sponsorship of the Taste of Reading.

• The plant received a plaque for its continued sponsorship of the Cincinnati Recreation Commission's Adapted Baseball program.

Q: What is adapted baseball?

A: It a baseball program for handicap children.

Early Truck Arrivals

Curt reported that four trucks have come early since the last meeting. This was a significant
improvement over the month before when the average of early truck arrivals increased to
three per week.

• Of the four trucks that arrived early, 3 arrived after 6:30 a.m. and one arrived at 8:00 p.m.

Community Update

Odors

Margie Lehrter explained that she has been dealing with plant odors for 12 years and she is very frustrated. She said the odors during the months of August and September were worse than the previous six months combined. She doesn't feel that the odor complaint line is effective. Margie developed a system where she ranks the intensity of the odors on a scale of 1 to 10. She said most of the odors come in between 5 and 9.

To assist in solving the odor problem, Margie would like to get a copy of Rohm and Haas' production schedule so she can coordinate the odors with what the plant is running on a particular day. Kevin Kaiser and Margie proposed an odor sniff panel of known chemicals and concentrations so she can distinguish rotten egg odors from ones that may be fishy, or smell like vinegar. Other suggestions from CAC members included giving the Lehrters some kind of air sampling device, such as draeger tubes to sample the air near their house. Margie mentioned that Ohio Citizen Action gave them a portable air-sampling device to use before.

Nancy Stall said she smells the odor periodically, more so when the wind comes out of the north. Kevin Kaiser said he recently followed a foul odor and tracked it to the asphalt trucks. Curt, Kevin and Jon commented how the odors can vary due to individual odor thresholds, temperature, vapor density and wind direction.

Q: Does the Mill Creek have an odor?

A: No, not anymore.

Q: Is there a sewer near the Lehrters' house?

A: Dave said there is one about three houses up.

Q: Is wind direction tracked on odor complaints?

A: Yes, the plant has a digital read out of wind direction.

Through Trucks on Bernard Avenue

Margie noted that there has been an overall increase of traffic on Bernard Avenue. She mentioned that Bernard was so quiet the week Viox monitored the truck traffic. Contractor trucks, such as Guyler Plumbers, are now using Bernard.

Shelter In Place Booth

Kevin said the fire department had a booth at the Taste of Reading. He used the Shelter In Place banners at the booth and distributed information and the bubble pens. He said the bubble pens were a hit and the fire fighters used them as a teaser to attract visitors to the booth to give them information.

- Q: Was the Reading Fire Department involved with the weapons of mass destruction mock disaster drill at Paul Brown Stadium?
- A: No, we weren't involved with that one, but our EMS unit did participate in the airport's annual disaster drill on September 7. Kevin said he is a member of the Local Emergency Planning Committee and the LEPC was going to be reviewing the disaster drills at its next meeting.

The meeting adjourned at 8:40 p.m.



May 9, 2002 Meeting Minutes

Members Present

Suzie Bateman
Bruce Beiser
Carol Bullock-Carpenter
Bill Ford
Debbie Goodhart
Chief Kevin Kaiser
Curt Lambert
Margie Lehrter
Cheyenne Ritz
Barb Stall
Margie Stall
Linda Stichtenoth

Visitors

Sabrina Smith (Reading High School Student, member of school's Environmental Club) Christa Zielke (Environmental Community Organization, ECO)

Facilitator

Bethany Dale

The meeting started at 6:05 p.m. in the second floor conference room at the Rohm & Haas plant. Dinner was provided. Bethany welcomed everyone, reviewed the agenda and introduced Christa Zielke, a visitor from ECO. The CAC members then introduced themselves to Christa.

Plant Update (Bruce Beiser) Safety

• The plant has operated 550 days without a lost-time injury. The last OSHA recordable injury occurred on September 19, 2001. The plant had one first aid incident this month.

Environment

- On May 6, 2002, the plant received a Notice of Violation from the Metropolitan Sewer District for having high levels of oil and grease in the plant's south sewer during a March 5 sampling event. Bruce said this might have been related to a March 4 pH deviation in the same sewer.
- Q: Will the plant be fined for this?
- A: There will be some kind of penalty assessed.
- There were no air releases to report since the April meeting.

- The plant continues to work on the methyl chloride reduction project. A two-hour sampling test was done on the existing system. Sampling results indicated that the plant will need to collect additional data. The plant made a list of all potential emission sources. A meeting was held with Air Products, a potential equipment contractor for the project. The plant also met with URS (environmental consulting firm) and requested a proposal for monitoring, sampling and flow rate analysis. The plant also met with Fisher Rosemont and Micromotion, equipment manufacturers, to get quotes for instrumentation. The plant expects to make a decision in the next few weeks about whether to use an outside contractor to collect the testing and flow measurements. It will take 1-2 months to collect the additional data required. The plant's central engineering team also conducted modeling.
- Regarding the RCRA site investigation, there was no on-site activity since the April meeting. The final report is being prepared and is due to the USEPA on June 3. Bruce will discuss the findings and conclusions at the June 13 CAC meeting.
- Bruce updated the CAC regarding the drums of solid waste that were found to contain
 low levels of radioactivity. Several drums of stannous chloride have been analyzed and
 do show low levels of radioactivity. The plant is going to investigate the source and
 will keep the CAC posted. The source of the radioactivity in the drums is lead 210.
 Lead is a contaminant metal in the tin metal the plant uses. Lead gets concentrated
 during the process and is probably creating a radioactive source.

Q: What were the levels of radioactivity?

A: I don't know. We were given some numbers but I don't have enough information yet to put them into perspective for you. I was told that the levels were very low and there is no health hazard associated with levels detected. I will find out more and let you know at the next meeting.

<u>Odors</u>

- The plant received three odor complaints since the April meeting. They were called in on April 20, May 1 and May 3. On April 20, the plant's overflow valve on the scrubber was shut and the scrubber couldn't accept any new material, which could have been the source of the odor. The plant is implementing corrective action regarding the overflow valve. Eric Walker could not find a cause of the odors detected on May 1 and 3.
- The ventilation/odor reduction project team met to get approval to proceed with option selection. Modeling was done to predict the concentration of mercaptan at the plant's fence line. The objective is to design the system so that the mercaptan concentration at the fence line is below the odor threshold. This may require stack ventilation and possibly a second scrubber to pick up additional potential emission points. This project is estimated to cost around \$300,000.

<u>Trucks</u>

• Bruce reported the following truck log. (Gene Koetter was not present at the meeting to provide his truck log.)

<u>Date</u>	Number of Trucks
	(Reported By Plant)
wk of April 8	4
wk of April 15	3
wk of April 22	0
wk of April 29	0
wk of May 6	2

Bruce noted that 6 of the 9 trucks he reported arrived at the gate at 6:45 a.m. or later. Deliveries are allowed at 7:00 a.m. Bruce said it usually takes about 10 minutes for the guards to verify the trucks' deliveries and paperwork before they can enter the gate.

Margie Lehrter added that she has seen several UPS, RPS and trucks with gas cylinders coming up and down Bernard Avenue. She noted that the trucks weren't necessarily going to Rohm and Haas.

Community Relations

- The plant had eight employees participate in Reading Clean Up Day. Carol Bullock-Carpenter said that 300 bags of trash were collected during the event.
- The plant selected the winner of its 2002 Reading High School \$1,000 scholarship.

Q: Does the scholarship recipient know that they won yet?

- A: No. The winner will be announced next week when Linda Stichtenoth presents the scholarship to the winner at the school's Honors Banquet. Bruce said this scholarship is renewable for four years provided the college student maintains passing grades and stays in the chemistry or chemical engineering field.
- Linda added that 12 plant employees passed out water at the Flying Pig Marathon on May 5. The employees' involvement allowed the plant to receive a \$500 grant from Rohm and Haas corporate through a program called Dollars for Doers. The plant will give the grant to the American Heart Association.

Crossroads Celebration Presentation (Bruce Beiser)

- The Crossroads Celebration is May 25, 2002 from 10 a.m. 4 p.m. It is part of the annual VYO Festival. It will take place near Jefferson and Benson Streets.
- The City of Reading has been working on a public relations program to help promote the city, keep Reading vital and active, and promote community involvement. As part of this new marketing campaign, the city came up with a slogan Reading, the Crossroads of Opportunity. Bruce handed out a new marketing brochure and gave away bumper stickers and static decals.
- Children can participate in a scavenger hunt. They will have cards to take around to the different booths to get stamped. When their cards are full, they can turn them in and enter a drawing to win a savings bond.
- The plant ordered Shelter In Place give aways to have out at the booth pens for children, pens for adults and magnets. Kevin also has literature about Shelter In Place.
- Bethany showed what the booth posters and banners would look like.
- Linda added that she would like to have a CAC fact sheet to hand out if people who approach the booth are interested in the group or as a way to help recruit new CAC members. The fact sheet will also have a membership roster.
- CAC members decided that they would have people fill out a card if they are interested in the CAC and place them in a basket to enter to win a programmable weather radio.
- The Reading Chamber is having a silent auction. There will be an art show of students' work at the Bank. Carriage rides will go from the booth area to Koenig Park.

Shelter In Place Presentation (Chief Kevin Kaiser)

Chief Kaiser said he would have at least one firefighter at the Crossroads Celebration at all times, provided there are no emergencies they need to attend to. He handed out a Shelter In Place informational brochure and gave a power point presentation about the program. He said the presentation would be running constantly at the booth. The firemen will handle technical questions from people who visit the booth.

For a summary of Chief Kaiser's presentation, please refer to the copies he distributed at the meeting. If you need additional copies, please contact Bethany Dale.

Questions & Answers for Chief Kaiser

- Q: How do you measure when it is safe to go back outside? Do you have portable air monitors?
- A: Most of the chemicals we are concerned about either have an odor or have odors put into them as a warning sign (i.e., natural gas.) We do have air-monitoring equipment we use and many of the fixed sites, such as Rohm and Haas, have monitoring equipment we can use. It is really a cooperative effort throughout the county.
- Q: Where are the three civil defense sirens in Reading?
- A: Our Lady of the Sacred Heart, Aventis and the Fire Department's Hilltop Station.
- Q: How often are you supposed to change the water in an emergency supply kit?
- A: Every six months, whether or not the seal has ever been broken on the containers.
- Q: Will you have a weather radio and an emergency supply kit at the booth so people can look at them?
- A: Yes, we can have both there.
- Q: How much are weather radios?
- A: The programmable ones are about \$70. The basic weather radios range from \$15-35.

Other Announcements

- Debbie Goodhart announced that the City of Reading is collecting old mercury thermometers in exchange for a new digital one during the month of May. Thermometers can be exchanged at the Fire Department.
- The American Cancer Society's Relay for Life will take place June 28 29 at the stadium in Reading. Companies and organizations are encouraged to enter a team. Debbie is going to bring more information to the June meeting.
- Bethany asked if the date of the November meeting could be changed from November 14 to November 7. Members said it would be fine to move the meeting date up one week.
- As of April 1, there is a new, safer valve on propane tanks for gas grills. Grill owners should either buy a new tank with a new valve or have their existing propane tank retrofitted with the new valve.

August CAC Meeting Discussion

Bethany reviewed the invitation and program agenda for the August 9 CAC meeting in Louisville.

In summary, Rohm and Haas' Louisville CAC has invited the Reading CAC to join them August 9 for a dinner meeting on an Ohio River tour boat. A speaker from the Army Corps of Engineers will discuss the history of river, as it was and as it is today.

A tour bus would leave the Reading plant Friday afternoon and drive to Louisville. The riverboat will leave the dock at 6 p.m. and return around 8:30 p.m. A joint activity could be scheduled on Saturday morning and then the bus would bring everyone back to the Reading facility. All CAC members are invited to bring a significant other with them. Rohm and Haas will pay for transportation, meals and accommodations.

Linda and Bruce said they would like to know as soon as possible if members plan to attend. If only a few members are able to make it, we would have to decline the invitation and try to go another time.

The meeting adjourned at 8:10 p.m.





April 11, 2002 Meeting Minutes

Members Present

Suzie Bateman
Bruce Beiser
Rachael Belz
Bill Ford
Chief Kevin Kaiser
Gene Koetter
Curt Lambert
Dave Lehrter
Margie Lehrter
Jim Pfennig
Cheyenne Ritz
Mayor Earl Schmidt
Barb Stall
Margie Stall

Visitors

Sabrina Smith (Reading High School Student, member of school's Environmental Club)

Facilitator

Bethany Dale

The meeting started at 6:10 p.m. in the second floor conference room at the Rohm & Haas plant. Dinner was provided. Bethany welcomed everyone, reviewed the agenda and told the CAC that copies of the charts from Eric Walker's February presentation were available at the meeting. These charts compared the plant processes and kettles that were running at the plant when the odor complaints were called in.

Plant Update (Bruce Beiser)

Safety

• The plant has operated 526 days without a lost-time injury. The last OSHA recordable injury occurred on September 19, 2001. The plant had two first aid cases from the same laboratory incident. Two employees received first-degree burns from a caustic material.

Environment

- The plant did not have any wastewater permit exceedances to the sewer system.
- There were no air releases to report since the March meeting.
- The plant continues to work on the methyl chloride reduction project. A goal deliberation was held. A corporate engineer from Philadelphia has been assigned to the project. The plant is reconfirming some of the design parameters due to problems with the data from IT Corporation. The plant is going back to re-measure flows and do more analysis on temperatures, pressures and flow rates.

- The plant met with the Hamilton County Department of Environmental Services' Division of Air Quality to discuss its Title V permit. The plant is working on a request to reduce its permitted emissions below 100 tons. If this is approved, the plant would be considered a "stationary minor" emitter rather than a "stationary major" emitter. This will help the plant continue to reduce air emissions.
- Regarding the RCRA site investigation, Geomatrix visited the plant to sample some of the groundwater wells for additional analysis and to review well levels. The final report is due in June and will be discussed at the June CAC meeting.
- The odor reduction project is continuing. The odor reduction survey is back from the ventilation expert. The odor reduction project is in the engineering department for "option selection." The engineers are evaluating what options it has for the ventilation issue.
- Bruce said he received a phone call from a hazardous waste site stating they had
 received a drum of hazardous waste from the plant that was radioactive. Bruce asked for
 samples of the waste so he could have them analyzed. The level of radioactivity detected
 was slightly more than "background levels," but not high enough to prevent the
 material from being landfilled.

Odors

• Bruce reported the plant received one odor complaint on March 25 at 3:30 p.m. He said it took two days to get the complaint paperwork from the boiler house to Eric Walker. By the time Eric investigated the odor, he didn't find any process that seemed to have caused the odor. Eric is reviewing why it took two days for him to receive the paperwork.

Trucks

- Bruce reported that this was not a good month for early truck arrivals. The plant had four trucks arrive at the gate early since the last meeting and another four the week of the meeting. He noted that there were three on Monday, April 8. Bruce sent a complaint to the trucking company the same day the three trucks arrived early. He read the response he got back from the trucking company to the CAC.
- Gene noted that the trucks arrived early on eight different days since the March meeting. He said that a Town Air Express package delivery truck drove up and down Bernard Avenue the day of the meeting. Gene added that a tanker from Houston delivering wax for Exxon arrived at the plant at 6 p.m. about 10 days prior to the CAC meeting. Gene asked them to move from the swimming pool parking lot and they did. Bruce said that this truck delivery was unusual because the product is usually delivered by railcar. Bruce asked Gene for a copy of his truck log so he could compare it to his. Gene provided the following dates and number of trucks arriving early to the plant since the March CAC meeting. (POST MEETING NOTE: Bruce compared the plant's truck log to Gene's. The plant's truck log is reported below as well.)

Number of Trucks	Number of Trucks
(Reported By Gene)	(Reported By Plant)
1	1
1	no truck report, this was a Sunday
. 3	3
1	1
3	3
1	1
1	1 (6:55 a.m.)

Bruce said the plant is proceeding with the ester capacity project. Most of the equipment has been ordered and they are waiting for delivery. Connections were made to the process

so when it is ready, the plant can just hook up to the equipment without shutting the whole process down.

Questions for Bruce

- Q: Were you disposing of the hazardous waste you mentioned earlier?
- A: Yes, we had sent it off site to Safety Kleen for disposal. Safety Kleen transported it to a place in Alabama. It wasn't a special disposal site. I will let you know what we find out when the lab results are back.
- Q: When you were talking about the Title V permit, did you say you were hoping to no longer be a stationary major facility?
- A: Yes, we are exploring how we could get a permit change on that. We are currently waiting on our Title V permit. The agency keeps making some changes. We are trying to get enforceable limits on methyl chloride emissions. We want to get the facility under 100 tons.
- O: Does the 100 tons mean releases?
- A: 100 tons is the total permitted emissions for all volatile organic compounds (VOCs) for the entire site. Methyl chloride is the largest VOC on site, by far. Our permit for methyl chloride is above 100 tons. We want to get the methyl chloride numbers down, so that when combined with the other VOCs, we hope to be less than 200,000 pounds plant-wide. We would not be out from under Title V unless our emissions for methyl chloride were below 10 tons.
- Q: Is that unlikely?
- A: We are hoping we can get there. That is our target. That's why we are making such a strong effort to make sure we have the right data.
- Q: You mentioned problems with the IT data for the methyl chloride project, what was that about?
- A: We are trying to confirm some of their numbers because some don't fit completely. We want to make sure we know where the emission point is so we can control it. We want to make sure we can account for all of it. We are spending money to put meters in to make sure we get a good material balance on the whole process.

Community Update (from neighbors)

• There were no additional comments from community neighbors.

Ohio Citizen Action Presentation

Rachael Belz gave a presentation about Ohio Citizen Action (OCA) and its Campaign for Safer Neighborhoods program.

Rachael's Background

Rachael said she is from Nebraska and became interested in environmental issues at a young age. Her family couldn't drink the water on their farm because the pesticide runoff in the area caused high levels of nitrates in the groundwater. She graduated from college with a journalism degree and began working in Lincoln, Nebraska with neighbors, mostly about agricultural issues. She came to Cincinnati in 1996 to work for Ohio Citizen Action. She is the Southwest Ohio Director and her territory includes everything between Northern Kentucky and Dayton. Rachael said her philosophy is that neighbors and industry are part of the same community and that they along with other stakeholders ought to be able to sit down at a table and talk about issues.

OCA Background

• OCA is citizen funded by roughly 100,000 members.

- The organization is a 501(c)(4), which means they are non-profit but can lobby.
- The types of issues OCA initially became involved with in 1975 were plant closings.

OCA got involved with environmental issues in the mid-80s.

 OCA worked hard in 1981 to get the Community/Worker Right-To-Know Act passed in Cincinnati.

Background on Good Neighbor Campaigns

• OCA in Cincinnati has been using them since 1997.

- The goal is to get neighbors and workers of a facility together with decision-makers at the facility to work through problems that are encountered to find solutions that benefit everyone.
- OCA started the campaigns because they and other groups in Ohio didn't feel like the Ohio EPA was doing a good job of protecting the environment.
- USEPA gives authority to Ohio EPA to run local programs like Clean Air Act and Clean Water Act. Here the Hamilton County Dept. of Environmental Services runs the air program including permits and complaints. Neighbors throughout Cincinnati have been frustrated with the county's complaint process.
- In 1996, OCA and the Environmental Community Organization conducted a Citizen's Audit of the Hamilton County Dept. of Environmental Services and found that over 90% of neighbor air complaints weren't tracked back to a company or a source. This number was unacceptable and OCA began to look at trends.
- During the canvassing campaign, OCA asks neighbors, who agree with what they are doing, to write a letter with or without a monetary contribution.

Cincinnati Specialties Case Study

• The company produces flavorings, saccharin and rust inhibitors.

• There were 6-10 neighbors who had complained about odors since 1988.

• The company also had 17 accidental releases of chlorine from 1990-1997.

- Facility is located in St. Bernard. Neighbors met with plant representatives in 1991. They filed a verified complaint with the Ohio EPA. In 1995, the neighbors were notified that the complaint had been dismissed. Neighbors were frustrated.
- Rachael requested to meet with Cincinnati Specialties in 1997. She also reviewed records at Hamilton County, Ohio EPA in Columbus and talked with plant neighbors and the fire chief. The company turned down her request to meet with them.
- OCA decided to begin a door-to-door canvassing campaign. This is a sticking point for many companies because it is scary that OCA is talking to neighbors about their facility's TRI, accidental releases, etc. This process necessitates a real discussion. Rachael said she has tried to have a real discussion before the canvassing begins, but it doesn't usually work that way.
- 18, 664 letters were sent to Plant President Jim McKenna.
- Neighbors had requested plant tours in the past, and they were finally able to receive
 one.
- Neighbors and plant managers have found common ground.
- OCA and neighbors wanted to reduce methanol releases to sewers as close to zero as possible because of the combined sewers in 240 sites in Cincinnati.
- Another goal of the campaign was to get the facility to build a chlorine enclosure building to use when they switch railcars. The chlorine enclosure building would eliminate, or at least reduce the number of accidental chlorine releases to the environment. Rachael had researched and toured a Clorox facility in Cleveland, which had built a chlorine enclosure building. Clorox was happy to talk to Cincinnati Specialties about the enclosure. Cincinnati Specialties decided to build a similar

- chlorine enclosure building and used many of the same equipment manufacturers that Clorox used.
- One of the end results of the campaign was the formation of a Community Advisory Panel (CAP), which is facilitated by Ann Green. The CAP has met monthly since February 2000. The CAP is still working on one odor issue.

Morton International//Rohm and Haas

- Rachael sent Bruce a letter requesting a meeting with him and he didn't respond to her first letter. Bruce admitted he didn't respond to Rachael's request and added that the plant was going through a corporate management change at the time.
- Rachael had done research of public records at all of the same organizations mentioned during the Cincinnati Specialties campaign. OCA put a Citizen Audit of Morton/Rohm and Haas together. The citizen audit was like an environmental credit report containing all of the public environmental information she found about the company.
- Rachael realized that Margie and Gene had historically called the air agency and the
 plant to make odor complaints. Margie and Gene had both been complaining for years,
 but they didn't even know each other. They eventually found out about each other
 through a Hamilton County Dept. of Environmental Services inspector who handled
 complaints from both of them.
- Rachael asked her full-time canvassers to begin a door-to-door campaign on Rohm and Haas. She told the CAC that it was nothing personal against Bruce, but he was the decision maker and the buck stopped with him.
- Rachael passed out the Executive Summary of the Citizen Air Pollution Audit of Morton International/Rohm and Haas to the CAC members. Rachael walked through the timeline on Morton's citizen involvement on page 10 of the audit.
- Rachael clarified that her campaigns have never worked with the intention to shut a plant down. OCA wants facilities to be good neighbors in that they operate in a clean, safe way, and have safe workplaces for employees, but not to shut a plant down.
- Rachael looks for opportunities for the plant to do right by the community and for neighbors to be heard and not go ignored so that in the end trust can be built.

Kevin said that the fire department received complaints from several nearby communities because of the manner in which OCA canvassers ask for a donation and request for the letters to be written. Margie Stall said she had a negative experience when a canvasser came to her door as well. Rachael apologized and expressed that is not the way she trains her staff to conduct the campaigns. Kevin and Mayor Schmidt added that the data OCA presents to neighbors could be hard to interpret. The Mayor said he received a lot of complaints when the OCA information was distributed at the Taste of Reading.

- Q: When you knock on doors and tell neighbors about TRI, do you tell people what the allowable limits are at the same time?
- A: No, because not all plants are within their reportable limits.

The mayor suggested that OCA tell people if plants are within the reportable limits when they knock on doors. Rachael added that the community standards are often different than what the federal limits are. Bruce said that a number of times he felt the spin OCA was using did not portray Rohm and Haas accurately, but when he raised the issues with Rachael, she often clarified the information on the material that she was distributing. Bruce said he responded to every letter that had a return address.

• Each one of OCA's canvassers knock on 80 doors a night. About half the people sign up for membership and make a contribution. People can write letters even if they don't contribute.

- OCA feels it provides a service to get the information out to people because it is difficult information to get.
- Q: How many hours of training do your canvassers receive before they start going door to door?
- A: Ten hours. I want my organizers to be as accurate as possible. In the summer our staff can get up to 30-40 people. Organization wide in Ohio; OCA knocks on a million doors a year and the number of complaints received are a very small percentage of that overall number.
- Q: Is there only one piece of paper that is passed out when you knock on doors?
- A: No, but the one that gets handed out the most is the letter writing flyer. (Rachael distributed the AK Steel flyer as an example.)
- Bruce said he took all of the letters very personally. One letter threatened him with an automatic weapon. He said he would not be associated with a company that was knowingly causing health problems in the community.
- Rachael stated that not everyone agrees with OCA's method of getting the plant to talk to neighbors.
- The neighbors said they got involved because they wanted to get answers and didn't know where else to go.
- In closing, Rachael said she could tell a big difference in dealing with the plant when Morton owned it versus Rohm and Haas. She said her initial goal was to get everyone to sit down at the same table to work through issues. In April 2001, she stopped the letter writing campaign because the plant agreed to work through the issues the community members raised. The working group met from April—December 2001 to set timetables to work through the four community issues. The working group rolled into the CAC in 2002 and Rachael felt this whole process has been successful in that the group is able to work through issues and everyone feels comfortable asking questions. Commitments have been made on both sides. She added that sometimes you have to start from scratch to build trust. She is glad that Rohm and Haas workers are part of the CAC.

In closing, the neighborhood members expressed appreciation to Curt Lambert for his commitment to the working group and the CAC. Rachael then shared a copy of the letter that she sent to Rohm and Haas ČEO Raj Gupta and a copy of the letter Raj sent to Rachael. She also distributed OCA's Winter 2001 News Magazine.

Bruce summarized by saying he is glad that the CAC is in place to meet regularly and he wants it to be ongoing. He said the plant has the full support of the Rohm and Haas corporation behind them to help work through the issues and the projects, but this could be frustrating at times because are cautious when it comes to spending money on large capital projects.

The community members added that more people in the community should know about the good things the plant is doing.

Shelter In Place

Kevin said he would talk to us at the next CAC meeting about the Shelter in Place program and what to say to people when they approach the booth at the Crossroads Celebration. Bruce is going to talk to the CAC about the city's Crossroads Celebration – what it is, what it means, etc. The May CAC meeting will be Thursday, May 9 from 6-8 p.m. at the plant.

The meeting adjourned at 8:10 p.m.



Community Advisory Council

March 14, 2002 Meeting Minutes

Members Present

Bruce Beiser
Rachael Belz
Debbie Goodhart
Tim Hoerst
Jon Hopkins
Kevin Kaiser
Dave Lehrter
Margie Lehrter
Jim Pfennig
Cheyenne Ritz
Linda Stichtenoth

Visitors

Josephine Ansems (Presenter, Rohm & Haas Occupational Health Nurse) Becky Turner (Presenter, Rohm & Haas Industrial Hygienist)

Facilitator

Bethany Dale

The meeting started at 6:10 p.m. in the second floor conference room at the Rohm & Haas plant. Dinner was provided.

Bethany welcomed everyone, reviewed the agenda and asked everyone to introduce him or herself. Tim Hoerst was welcomed to the group as a new CAC member. He replaced Mike Rahall as Reading Safety Service Director.

Announcements

• Debbie Goodhart mentioned that there is a health fair at S.S. Peter and Paul on April 16. The health fair will be open to the community.

• Rachael requested a copy of the odor survey charts that Eric Walker presented at the February meeting so the group could track the progress over time. Bruce said he could provide the charts without the plant's product trade names listed.

Plant Update (Bruce Beiser)

Safety

• The plant has gone 485 days without a lost-time injury. The last OSHA recordable injury occurred on September 19, 2001. The plant did have a few first-aid incidents since last month.

Environment

• The plant had a permit exceedance on the south sewer on March 4. Lab operations caused the pH to drop to 4.0 over a 20-minute period. The permitted pH level is 6.0.

The exceedance was reported to the Metropolitan Sewer District.

• Rohm and Haas' corporate legal department approved the "Letter of Intent" from the manufacturer of the cryogenic chiller. Once the plant gets the engineering drawings from Jacobs Engineering, it can begin the hazardous operations study. This is the last step before the funding for the chiller can be requested. Bruce didn't know the timeline for the project yet, but hoped to have more to report at the next meeting. Rachael asked Bruce if he could show the engineering drawings to the CAC once he gets them. Bruce said he could share a simplified process flow diagram with the group.

There was very limited activity going on with the RCRA site investigation. The investigation of the alleged drum burial did not reveal any buried drums, only a farmer's

dump, i.e. chicken wire, old dishes tractor seat.

• The plant received the outside consultant's report on the building ventilation project. Bruce hoped to have more information to report at the next meeting.

Q: The Ohio EPA Weekly Review from March 4 lists an application for a permit to install organo sulfur compound production at the plant, what does that relate to?

A: This is for the ester capacity project. It will allow the plant to install new equipment to increase the output of the mercaptan ester that we use as an intermediate stabilizer. We hope this will help eliminate some of the odors.

Trucks

• Bruce reported that there had not been an early truck arrival in six weeks. Rachael asked about the truck Gene had reported at the last meeting. Bruce was going to go back and check the truck log. (Post meeting note: Bruce checked with the guard and he did not have a report of the truck that Gene mentioned. Bruce said this discrepancy may be due to the truck arriving after 6:30 a.m. The guard may not have noted it because it was so close to 7 a.m., which is when the trucks are allowed to enter.)

A Service Transport tank truck went down Bernard Avenue since the last meeting. Bruce registered a complaint with the dispatcher of that trucking company. The driver said he saw the sign not to turn down Bernard, but it was too late to turn around. The driver said he got directions to the plant off the Yahoo web site. The plant now puts a

phone number with recorded directions to the plant on its purchase orders.

• Bruce got a response back from Kuntzman Trucking, which was one of the truck companies he had complained to about early arrivals at the plant gate. The company gave Bruce a copy of a letter sent to their drivers stating that Rohm & Haas will not accept shipments before 7 a.m. and will not allow parking in the neighborhood. (A copy of this letter is attached.)

Community Relations

• Bruce committed to having a booth at the Reading Crossroads Celebration on May 25, 2002 so the CAC could distribute Shelter In Place information.

• Linda Stichtenoth said the plant was sponsoring Camp Invention. This is a national program sponsored by the National Inventor's Hall of Fame. It is a hands-on day camp that teaches students creative chemistry and team building skills.

• The Reading Chamber of Commerce invited plant representatives to Reading Hilltop Elementary to discuss the plant's involvement in the Junior Achievement program.

The plant sent science scholarship applications to Reading High School.

• The plant is supporting the Great American Clean Up. Linda added that maybe the plant and the CAC could get involved if Reading is doing anything around this event. City of Reading members mentioned the city is holding a Reading Litter Clean Up Day on April 27, 2002 and Carol Bullock-Carpenter could provide more information.

Community Update (from neighbors)

• Margie Lehrter stated she smelled an odor from the plant once since the last meeting, but did not call the odor complaint line because she was on her way out. She said she has noticed an improvement, but didn't know whether the plant was running at full capacity. Bruce said that the plant was running regularly.

Presentations

Copies of the Medical Surveillance Program and Industrial Hygiene presentations are attached.

Questions, Answers, Comments

During Josephine Ansems' Presentation

Q: What do you do if tin is detected in someone's urine?

A: It depends on the level. People shouldn't have any tin in their urine. We look at what the individual has been doing inside the plant. At the levels we test for and are detecting, there is no health impact. Our action level of exposure is 0.5 parts per million (ppm) in urine. (POST MEETING CORRECTION: The plant's action level of exposure to tin is 0.05 ppm.)

Q: Has anyone at the plant ever had that level?

- A: Yes, we had two last year. We do a root cause analysis if the level detected is 0.2 ppm. When a worker has a level of 0.05 ppm in their urine, they must provide a urine sample everyday for three days after the initial sample tested positive. Tin is water soluble and is quickly excreted from the body, so we can track the decrease.
- Q: If someone has a high level of tin in their urine, do you test other employees who work in that individual's area?
- A: Yes, if we detect tin in an employee, we immediately look at who else may have been working in the same area and test them too. For maintenance work performed in certain areas it is routine procedure that employees provide a urine sample everyday for three days.

Comment from Josephine: About seven years ago, the plant did a fifteen-year retroactive study on the medical records of all production employees. The study was done with the Director of the Family Physicians Program at the University of Cincinnati. The medical records were reviewed by Joesphine and two other doctors who evaluated 50 components as to whether long-term, low-dose exposure to tin had any adverse health effects. In the end, the findings showed that none of the plant employees had any adverse health effects from working with or around tin.

Q: How many times per year is the urine test done?

A: Generally, four times per year. Maintenance workers or other employees who work on valves or open lines, are required to be tested three days in a row following their work in that area of the plant. Exposure to tin at our plant is usually dermal, meaning through the skin.

Comment from Bruce: Our detection level for tin is very sensitive. In fact, when Crest toothpaste had stannous fluoride in it, we were able to detect which of our employees used it. We are also able to detect if someone drinks tomato juice from a can that has been opened and left in the refrigerator too long. We knew this because people would show up with tin in their urine for no reason. When we would ask our employees about this, it was usually that they ate or drank out of a tin can very recently. There aren't many tin cans anymore and Crest no longer uses stannous fluoride.

Comment from Jon Hopkins: If a worker is in the area of the plant with tin for more than five minutes, he or she automatically has to report for a urine test the next day and for two days after that. If they are in the area for a second day in a row, that adds one more test day that they have to provide a urine sample. We try to rotate out mechanics, so they aren't in that area for more than one day at a time.

Comment from Linda: We also have a new program called the Global Fit Program. This allows our employees to purchase memberships to fitness centers at reduced rates.

Josephine concluded her presentation stating that she feels very comfortable with the plant's medical surveillance program. She added that through the program, she has been able to help employees identify unrelated health problems.

Questions, Answers, Comments

During Becky Turner's Presentation

Q: Is methyl chloride the most dangerous chemical you have at the plant?

A: No. Chlorine would be the most dangerous in terms of an immediate health hazard.

Q: Do you give MSDS to the employees?

A: Employees have access to MSDS for all of the chemicals we have on the site. The plant holds monthly safety meetings and at every meeting there is a "chemical of the month." Information about this chemical is read by one of the employees so there is constant reinforcement on how to handle chemicals.

Q: Could Material Safety Data Sheets (MSDS) for the same chemical be different if different manufacturers provide them?

A: Yes. To some extent, the manufacturer can choose how specific and how much detail they want to provide. The basic physical properties of the chemical should always be the same. Also, OSHA exposure limits should always be the same.

Q: Does OSHA create their own MSDS?

A: No.

Comment from Bruce: The plant has an internal MSDS program because different manufacturers list the information in different orders and they vary in length. We have taken all of the MSDS for all chemicals on site and have standardized them so that the required information is in the same order on each MSDS. The fire department also maintains a set of the plant's MSDS for raw materials and finished products for emergency response preparedness.

Shelter In Place

The CAC agreed to have a Shelter In Place booth at Reading's Crossroads Celebration on May 25. Bruce is going to provide the actual booth. Bethany is going to coordinate the booth graphics to include the Shelter In Place logo and directions, City of Reading logo, CAC logo and the Alliance For Chemical Safety logo. Cheyenne Ritz is going to talk to the Environmental Club to let them pick out Shelter In Place give aways for kids. Linda is going to meet with Bethany to pick out give aways for adults. The CAC said they definitely want to have magnets and maybe pens or pencils. Kevin said there are just under 5,000 households in Reading and about 12,000 residents. Members agreed to sign-up to staff the booth throughout the day. Kevin volunteered that he would have at least one fireman at the booth at all times.

Agenda Setting

The CAC selected the following agendas for the remainder of 2002.

April 11 Ohio Citizen Action presentation by Rachael Belz

May 9 Shelter In Place training session/planning for Crossroads Celebration

June 13 Report on plant's 2001 Toxic Release Inventory / Geomatrix

presentation of final RCRA site investigation report

July No meeting

August 14 Trip to Louisville CAC, boat trip on Ohio River for spill control

demonstration

September 12 Plant tour

October 10 Sustainable Development Program by Rohm & Haas Corporate Working meeting – 2003 Agenda Setting/Evaluation of CAC and

plant

December No Meeting

The meeting adjourned at 8:10 p.m.



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MARCH 6, 2002

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WHEN YOU CALL IN TO DISPATCH YOU MUST HAVE YOUR BILL OF LADING NUMBER, THE TOTAL NUMBER OF PIECES LOADED, AND THE GROSS WEIGHT OF THE SHIPMENT, AND THE NUMBER OF THE TRAILER YOU ARE PULLING. THEN DISPATCH WILL GIVE YOU THE PRO NUMBER FOR THE LOAD. PLEASE HAVE THIS INFORMATION READY AND AT HAND STARTING MONDAY MORNING.



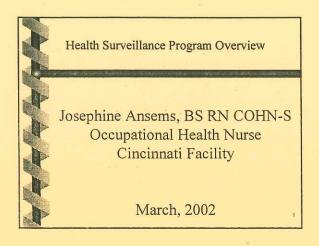
PLEASE NOTE: ANY DRIVER HAULING A LOAD FROM G-P. MOGADORE, OH TO MORTON ADHESIVES IN CINCINNATI, OH DO NOT, REPEAT DO NOT ATTEMPT DELIVERY BEFORE 7AM DO NOT PARK ANYWHERE IN THE NEIGHBORHOOD - YOU WILL BE TICKETED AND POSSIBLY TOWED. SCHEDULE YOUR ARRIVAL SO THAT YOU CAN DRIVE DIRECTLY INTO THEIR GATES - AFTER 7AM

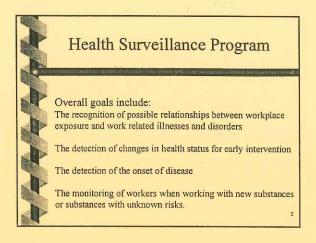
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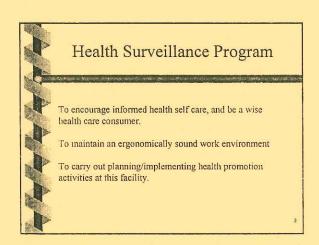
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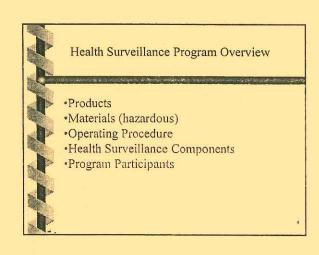
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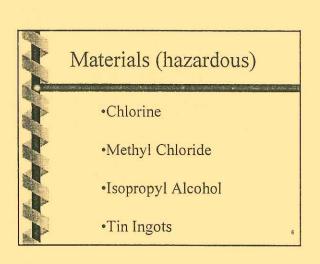


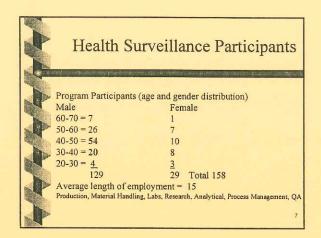


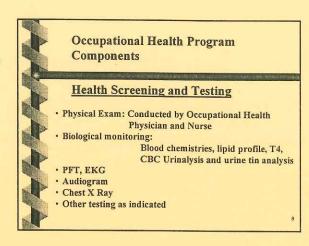












Industrial Hygiene Overview

Cincinnati Plant March, 2002





Definition of Industrial Hygiene (IH)

"The science or art devoted to the prevention, recognition, evaluation, and control of hazards or stresses in the workplace which may cause illness, injury, or significant discomfort."

(S) Requisits to

You are a manager in a chemical facility and are asked the following question by your employees:



"We work with a lot of chemicals; how do you know this job is safe and won't make us sick?"

S Necessaria Con

IH vs. Safety

<u>IH</u> is interested in longer-term, chronic, health hazards in the workplace.

<u>Safety</u> concerns itself more with shortterm acute hazards which result in injuries.

(5) Auguratio Con

Laws

- OSHA Occupational Safety and Health Administration
- NIOSH National Institute of Safety and Health (here in Cincy)
- · OBH Ohio Board of Health

(S)

IH Program

- Chemical exposure
- Noise exposure
- Ergonomics
- Sanitation
- Illumination
- Heat/Cold Stress
- Control Systems e.g. ventilation
- · Personal Protective Equipment
- Training

S Indiana

What makes a chemical hazardous to employees?

- Properties (liquid, gas, vapor, solid)
- Toxicity (effect on body systems)
- Route of entry (how it gets in the body)
- Quantity (amount taken in by the body)
- · Duration (hours, days, years)
- Individual Susceptibility (age, gender, state of health, tolerance, etc)

Facunda Con



Addressing Workplace Chemical Hazards

- · Identify hazardous chemicals
- · Identify exposures
- Measure exposures
- · Reduce/control exposures
- · Personal protective equipment -- "last resort"
- · Hazard information and training

(S) Parents (s)

ROHIN

Hazard Information - MSDS

(Material Safety Data Sheet)

OSHA Required Sections

- · Material Identification
- · Composition
- Hazards
- First aid measures
- Fire fighting
- Accidental release
- Handling and storage
 Exposure control and
- Exposure control and protection
- Physical and chemical properties

Stability and Reactivity

- Toxicology
- Ecology
- DisposalTransportation
- Regulatory
- Other

Review of typical MSDS

Methyl chloride

15

ROME



Community Advisory Council

February 14, 2002 Meeting Minutes

Members Present

Bruce Beiser Rachael Belz Mickey Eling Bill Ford Jon Hopkins Kevin-Kaiser Gene Koetter Curt Lambert Dave Lehrter
Jim Pfennig
Cheyenne Ritz
Barb Stall
Margie Stall
Linda Stichtenoth

Visitors

Eric Walker (Rohm & Haas Environmental, Health & Safety Engineer/presenter) Sabrina Smith (President, Reading High School Environmental Club) Beatrice Miringu (Ohio Citizen Action, Toledo)

Facilitator

Bethany Dale

The meeting started at 6:00 p.m. in the second floor conference room at the Rohm & Haas plant. Dinner was provided.

Bethany welcomed everyone, reviewed the agenda and asked everyone to introduce him or herself.

Plant Update (Bruce Beiser)

Safety

— The plant has gone 457 days without a lost-time injury. The last OSHA recordable injury occurred on September 19, 2001.

Environment

- The plant received a letter of intent from the manufacturer of the cryogenic chiller. Rohm & Haas' legal department in Philadelphia is reviewing the letter. The plant needs to get the engineering drawings from the cryogenic chiller supplier because they need to conduct a hazardous operations study before the funding request can be submitted.
- The plant received an information request from the USEPA regarding the November methyl chloride release. The information was submitted to the agency on February 11.
- The plant received a Notice of Violation from the Hamilton County Department of Environmental Services (DOES) for the same methyl chloride release. The plant has some questions about the notice and is working with the DOES to resolve them.
- There was no activity going on with the RCRA site investigation. Geomatrix will be coming in March to install a monitoring well on the north side of the facility. The final investigation report is still due in June.

Community

- Linda Stichtenoth told the CAC about the plant's involvement in Black History Month. The plant has an African American Leadership Network that hosted a celebration for employees and retirees. They also sponsored an essay contest at Reading, Princeton and City of Cincinnati public schools. The essay topic was African American inventors. Winners received a \$100 gift certificate to Border's Books. Teachers of the winning students also received a gift certificate to purchase books for their classroom. The winners were invited to the celebration, where they read their winning essays.
- The plant is continuing with its involvement in Junior Achievement. So far 12 employees have been trained to be instructors.

Trucks

• Bruce reported that there was one early truck arrival since the last meeting. The truck was Safeway Trucking and it arrived at the plant at 6:15 a.m. Gene Koetter informed the CAC that there was a truck that came early on February 11 at 2 a.m. He also commented that the Fed Ex trucks are still driving up Bernard.

Odors

• Dave Lehrter stated that he smelled an odor from the plant on February 13 at about 4:30 p.m. He did not call the odor complaint line because he was on his way out.

Community Update (from neighbors)

• The issues have already been covered tonight.

Internal Odor Source Survey Presentation (Overview by Eric Walker)

During the internal odor survey, the plant asked several facility personnel to document the type of odors they detected on a daily basis. The odor survey form was similar to the external odor survey form, except plant personnel were asked to list the source of the odor, if known, and any possible solutions to help eliminate these odors. The survey lasted 2 months.

Survey Results

- The plant received 142 completed surveys. The types of odors documented were:
 - 22 bleach (chlorinated) odors
 - 12 ammonia odors
 - 8 mercaptan odors
 - 2 amine odors
 - 1 fishy smell
 - 1 fuel oil
 - 1 paint-like odor
 - 95 detected no odor at all

Odor Sources Identified

- Bleach

The bleach odors seem to originate from the scrubber system located in building 11/12.

— Ammonia

The ammonia odors were coming from the off-loading of the ammonia tank truck. The ammonia fumes were collected by water in a scrubber and then discharged to the facility

sewer system. The ammonia fumes would then escape the combined sewer system through sewer gratings.

— Amine

The amine odors were produced from the asphalt additive process.

- Mercaptan

The mercaptan odor has several possible sources, primarily from the main process buildings, which are buildings 3, 3A, 4 and 4A. The plant compared the results of its internal odor survey to the results of a survey performed in 1994 by IT Corporation to determine the various sources. The survey in 1994 led to the installation of the scrubber that is now in operation in buildings 3 and 3A and the installation of a cover on the west sewer outfall.

Addressing the Sources

- Bleach

The plant has had a quarterly equipment leak-monitoring program in place for a number of years. They're also planning on conducting a study of all the plant scrubbers, to see if there are any opportunities for optimization.

— Ammonia

Eric feels the primary source of the ammonia odors has been resolved. In mid-August of 2001, the ammonia off-loading process was modified. The plant now uses a vapor recovery system that collects the displaced fumes in the storage tank and transfers them to the tank truck, as it is being off-loaded, instead of sending the displaced fumes to the scrubber. The scrubber is no longer utilized.

— Mercaptan

The plant has several projects slated for 2002 that it believes will reduce these odors.

- 1. The building 3, 3A, 4, 4A ventilation project is currently being analyzed by corporate personnel to insure that worker exposures inside the buildings are being addressed appropriately. One advantage of the ventilation project, in addition to balancing the building air flow, is to pull the fumes that are currently being released at ground level and discharge those emissions above the building. Since the fumes are released at a higher altitude the ground level odors should drop significantly.
- 2. The plant is looking at the suggestions provided by plant personnel during the internal odor survey. (i.e., tying additional sources into the existing scrubber, addressing water discharges from the processes)
- 3. The plant has assembled a team to look at possible solutions to eliminating odors from the facility's combined sewer system. Goals of this team include preventing off-site odors, prevention of gas evolution, prevent possible incompatible materials from contacting one another, decrease amount of odorous compounds from entering the sewer, and possible recycle options. Samples from the combined sewer system were taken last week and are being analyzed.
- 4. Ester capacity expansion project, which is planned for this year, may decrease the amounts of 2-mercaptoethanol (2-ME) entering the wastewater.
- 5. Replacement of steam ejectors in Building 3, 3A with vacuum pumps. The steam ejectors release water and odorous compounds to the sewer system.

Equipment Installed to Reduce Odors

- 2-ME off-loading process has been modified to a vapor recovery type process. This process is almost identical to the ammonia off-loading modification.
- The material-handling department has purchased hose caps for raw material off-loading hoses.
- The effluent wastewater from building 3, 3A has been re-piped. Previously, the effluent from the process was mixing with the effluent from the building scrubber and causing some odors.

Trends

Eric tracked 38 external odor complaints that were reported from 7/24/00 to 12/07/01. When the complaint was reported, he looked at what kettles were running in the plant, what processes were running in those kettles, what kinds of vacuum systems were running at the time, and whether or not the pastillation system was running.

He was able to identify the following trends based on this analysis.

- Three kettles, used in the process of making PVC stabilizers, were running when the majority of odor complaints were reported. (Out of the 38 complaints, the three different kettles were running when 36, 30, and 26 of the complaints came in, not necessarily at the same time.)
- The steam ejector system on two of the kettles was running when more than half of the complaints were reported. (Out of the 38 complaints, the steam ejectors on these two kettles were running when 19 and 23 of the complaints came in.) Eric noted that this a possible source of the odors that come from the sewer system. The plant is looking into replacing the steam ejectors with vacuum pumps in 2002 to reduce this odor. (The plant had replaced the steam ejectors with vacuum pumps once before, but at the time the technology wasn't very good and they had to switch back to the steam ejectors.)
- The pastillation process, which allows a product to be made into little beads, was running when 20 of the complaints were reported.

Eric commented that when an odor complaint is reported and he calls the individual back, most of the time he reports that all of the processes are "running normal." He clarified that he is not insinuating that there are no odorous emissions leaving the plant, just that there has not been an upset in the process that would cause abnormal operations.

Questions, Answers, Comments

Q: During the odor survey, did you collect information about odors coming from areas outside of the plant's fence line?

A: No, the survey only covered odors that were coming from the plant.

Q: What was the internal odor survey timeframe?

A: Employees from all shifts were asked to complete the surveys during a two-month period.

Q: Do you plan to conduct the survey again to measure your progress?

A: We don't have plans to at this time, but that would be a good idea.

Q: Are any of the odors impossible to get rid of?

A: We have taken care of the odor sources that were easy to address. The remaining sources will be difficult to solve, but we will continue to work on them. The ester project has some technical capabilities to overcome before it can be installed.

Q: Did the employees who completed the survey review just their process area, or did they walk the plant?

A: The employees completed the surveys during their normal work routines, wherever that may take them during their shift.

Q: Are any of the odors harmful to plants and animals?

A: The odors are irritating to smell. The mercaptan odor, which is one of the most common odors, has a very low exposure threshold. It might be around 1 part per billion. There is not an established odor threshold, but OSHA is working to fill in those gaps where exposure levels are not in place. (The plant said that Becky Turner, the plant's EHS administrator, could give a presentation on the 2-ME material safety data sheet, which contains exposure data.)

Q: Did Morton or any of the other plant owners use products that Rohm & Haas doesn't use today?

A: Yes, the market has changed over time and there were many products that were historically used here that aren't being used right now. For the most part, the plant has eliminated most of the dangerous chemicals. We are trying to use products that are water-soluble.

C: I was at a community meeting recently and it was stated that Reading has the worst cancer statistics in Hamilton County.

Response: Kevin Kaiser said he was at the meeting and that was a misstatement, the speaker was referring to Hamilton County as a whole compared to other regions. He said the only trackable health statistics in Reading right now are the trauma records.

Bruce commented that Rohm & Haas has a company-wide cancer registry. The company started it after one of its plants in Philadelphia was found to have a chemical that was causing cancer in some of its employees. The company tracks all cancer incidents in its employees and retirees. He also said the Reading plant has a full-time industrial hygienist and health nurse who could talk about the plant's employee medical surveillance program. (Post meeting note: Former Morton International plants did not track cancer statistics on a corporate level; therefore, historical cancer data from these plants is not included in the Rohm & Haas cancer registry prior to the acquisition of Morton International. Rohm & Haas now tracks cancer statistics and data, where available, for all of its sites including the former Morton plants.)

Shelter In Place

Kevin gave Bethany a City of Reading Event calendar. He continues to give the Shelter In Place presentation to various groups in Reading. He said they are not ready to go into the schools yet. CAC members agreed to review the city event calendar (which is being attached to these meeting minutes) and try to sign-up to staff an information table at one of the events.

Kevin and Bruce have some money that the CAC can use to purchase some additional give-aways. Cheyenne Ritz and Sabrina Smith said the environmental club would like to get involved. Sabrina also said the National Honor Society and the Esteem Team have to fulfill community service projects and they might be interested as well. The CAC would like to make some Shelter In Place Emergency kits for "at risk" populations such as senior citizen centers or day care facilities.

Bethany will bring information from the vendors the Alliance for Chemical Safety ordered its give-aways from.

Agenda Setting

The plant decided to wait until the next meeting to set the agenda for the rest of the year.

The meeting adjourned at 8:00 p.m.

Next CAC Meeting

The next CAC meeting will be March 14, 2002 from 6:00 – 8:00 p.m. at the plant, in the second floor conference room. We will be discussing the plant's medical surveillance program and continue planning the Shelter-In-Place community education campaign.



Community Advisory Council

Cincinnati Facility

September 13, 2001 Meeting Minutes

Members Present

Sue Bateman
Bruce Beiser
Debbie Goodhart
Kevin Kaiser
Dave Lehrter
Margie Lehrter
Jim Pfennig
Cheyenne Ritz
Barb Stall
Margie Stall
Linda Stichtenoth

Visitors
Robin Cole
Curt Lambert
Deb Leonard (speaker)
Lt. Scott Snow

Facilitator

Bethany Dale

The meeting started at 6:00 p.m. in Council Chambers at the Reading Municipal Building, located at 1000 Market Street.

October Meeting Update (Bethany)

The CAC from Rohm & Haas' Louisville plant will be visiting our CAC in October. The Louisville CAC has been around since the mid 1980s. They were the first ever CAC established. Some of the existing members have been on the CAC since it was created. The October meeting will be a great forum for us to hear about their experiences.

The agenda below has been prepared to give our CAC members as much information as possible regarding the meeting. Members are invited to all of the activities. (Rohm and Haas will cover all expenses.) We will need to make reservations for several of the events, so please let Bethany know as soon as possible if you plan to attend. Also, please let her know if you have any special dietary needs.

JOINT CAC MEETING AGENDA Friday, October 12, 2001

Louisville CAC arrives in Cincinnati

11:30 a.m.

Joint Cincinnati & Louisville CAC Lunch at Sorrento's

Noon

(for any CAC member who wants to attend)

Louisville CAC Tours City of Reading (Cincinnati CAC tour guide needed)

1:30 p.m.

Joint CAC tour, dinner and meeting at the plant

5:15 – 8:15 p.m.

Introductions & Plant Tour*

5:15 p.m.

Dinner: Catered by Montgomery Inn (Traditional CAC meeting begins)

6:10 p.m.

Plant Updates (Cincinnati & Louisville)

7:00 p.m.

Working Group Update

7:20 p.m.

Information Sharing among CACs

7:30 - 8:15 p.m.

Saturday, October 13, 2001

Renaissance Festival in Harveysburg, OH

10:00 a.m. – 1:30 p.m.

^{*}If anyone is unable to tour the plant at this time, you can schedule a tour on another day more convenient with your schedule.

Other Membership Notes

Bethany passed around a sign-up sheet asking members to check how they wanted to receive meeting minutes in the future (hard copy vs. Rohm & Haas website). Bethany said that hard copies will be distributed when they are completed and posted on the web. (For members who missed the meeting, please let her know if you wish to receive the minutes in different version.)

Plant Update by Bruce Beiser

Bruce asked for a moment of silence and recognition for the victims of Tuesday's tragedy.

Safety

- The plant had its fourth recordable worker injury for the year when a production operator experienced chemical dermatitis from working with wet shoes and not wearing proper personal protective equipment.
- The plant has implemented higher security as a result of the terrorist attacks on the U.S. The gate was closed at all times and an extra guard was used to verify ID before entry to the plant.

Environmental

- MSD performed its annual audit of the facility and record keeping. Everything
 was in order and there were no findings to report.
- There were a number of odor complaints from the community. All were investigated. The plant continues to work on the action plan presented to the Working Group. Additional actions are being taken as well:
 - closed loop unloading of 2-ME containers;
 - modeling of the previously identified emission sources for odor threshold;
 - phone training is scheduled for personnel answering the community odor complaint line;
 - problem reported in contacting boiler operator lead to an improvement plan involving a search for improved communication equipment (such as cordless digital phones).
- A third party audit was conducted at the facility by three USEPA approved auditors. The audit lasted 3 1/2 days. The final report is not yet available; however, the auditors found no evidence of environmental harm outside of studies currently underway by EPA order. We will share the final report when it is complete.
- Samples are being taken and analyzed as part of the RCRA investigation at the plant. The contractor is installing shallow sample wells on the east bank of the Mill Creek. The contractor will also be excavating the NW corner of the parking lot to look for the alleged buried drums.

Community

- The plant had an increase of early arrival truck traffic beginning Labor Day weekend. The causes have been identified and actions have been taken. Six of these trucks were from Lee's Trucking. These early arrivals were due to the railroad misdirecting two railcars to the wrong city. The plant had to order 10 trucks to maintain supply for production. The supplier was directed to either get Lee's to comply with our policy or we would not accept delivery in Lee's equipment. (Copies of the letter Bruce sent to the plant's suppliers and transporters are available.) Others have been dealt with on an individual basis. Added the truck restriction on Bernard and Reisenberg Avenues to the Good Neighbor Policy and new copies are being distributed. There was one FedEx delivery truck that drove down Bernard. That driver was advised of the truck restriction.
- The plant's annual blood drive was scheduled for September 12. Due to the tragedy of the terrorist attack, donation was excellent. We were especially pleased when members of the community called to donate as well. We had 60 volunteers and were able to get 53 donors.
- The plant made its annual sponsorship to help support the Taste of Reading.

Update from the City

The city has put up new signage on Reisenberg. There are also new flashing lights on Reisenberg. On top of those flashing lights, the city has posted a sign that says, "Do not turn on Reisenberg." Bruce has also requested help from the city to post three signs near the stadium that say "No Truck Parking from 10 p.m. to 7 a.m." Members discussed the overall problem of truckers having a lack of truck stops and lack of room at what few truck stops there are to park for the night.

Shelter In Place/NOAA Weather Radio Presentation (Debbie Leonard)

Deb Leonard is the coordinator for the Alliance for Chemical Safety (ACS), a non-profit organization established in 1997. Membership includes Greater Cincinnati industries, government agencies, emergency responders, non-profit organizations, and community representatives who have joined together to promote public understanding and involvement in chemical risk management.

The ACS is always looking for more citizen members. It doesn't cost anything for citizens to join. Monthly meetings are held from 3:00 p.m. to 4:30 p.m. the third Wednesday of each month at the Avon Woods Nature Center, 4235 Paddock Road in Paddock Hills. Meetings are open to the public.

Here is an outline of Debbie's presentation on Shelter In Place and the NOAA Weather Radios, which are now being used to notify residents of hazardous material emergencies. Extra copies of presentation materials are available from Bethany Dale for any members who missed the meeting

Introduction

In Hamilton County, more than 100 hazardous material emergencies occur each year

- Spills of liquids or releases of airborne chemicals in vapor clouds, which can involve industrial facilities, railcars, tanker trucks, barges, etc.
- Most chemical emergencies are small, like a fuel spill on the highway or a laboratory accident
- Some are large and result in harm to people and property, but these are RARE
 - BASF in Evanston, 1989
 - Auxier Gas in Batavia, 1999

How are incidents handled?

- Incident occurs
- Incident commander (highest ranking firefighter) arrives and assesses emergency
- If incident involves an AIRBORNE RELEASE and poses significant risk to life or human health, incident commander can request that the public be notified
- The public will be notified in the following way:
 - NOAA weather radio
 - Outdoor warning sirens (civil defense sirens)
 - Door-to-door notification
 - Vehicle public address system
- NOAA weather radio is main form of notification:
 - Hamilton County is first county in Ohio to use weather radios for hazardous material incidents
 - Incident commander relays request to Hamilton County Communications Center
 - Hamilton County contacts National Weather Service office in Wilmington, Ohio
 - HazMat alert is broadcast over weather radios
- All Hamilton County schools, licensed day care centers and senior centers have NOAA weather radios
- Many citizens have weather radios (but not 100% coverage)
- NOAA weather radios cost between \$30 and \$70 and are available at stores like Wal-Mart, Radio Shack, Costco, etc.
- Hope to approach industry & local businesses for donations to purchase NOAA weather radios & distribute like smoke detectors

Shelter In Place

- 99% of the time, Shelter In Place is the recommended safety action during a hazmat emergency
- Studies have shown that airborne chemical concentrations can be reduced by 80-90% by sheltering in place
- The steps for Shelter In Place are as follows:
 - Remain calm
 - Bring in children and pets
 - · Leave children at school
 - Do not leave your residence
 - Close all windows and doors
 - Turn off air conditioners, heating systems, fans, etc.

- Do not use your phone
- Go to the highest point in your residence
- Turn on radio and/or TV for special instructions
 - WLW-AM 700 and WRRM-FM 98.5 are the designated emergency stations
- Remember, this information is different from severe weather instructions!
 - Do not go to your basement
 - Do not go outside

Q: Will all weather radios broadcast these messages?

A: Yes, all NOAA weather radios will work.

Q: What does the weather radio say when there is a hazardous material emergency?

A: The radio will beep, the light alert will flash and a verbal message will state where the accident took place, which neighborhoods are affected and to Shelter In Place.

Q: If I have a programmable weather radio, will it give me an option to turn "off" or "on" the hazardous material messages?

A: I don't think you will be able to turn off the hazardous material alerts.

Q: If Shelter In Place is for airborne accidents, why do you go to the highest point in your house?

A: Because a lot of chemicals are heavier than air and they tend to sink to the ground level.

The ACS is working to educate Hamilton County citizens on Shelter In Place. The ACS recently made a video that will be shown throughout the County. ACS is currently working with the American Red Cross and the Cincinnati Fire Division to initiate an education program for school children. The Alliance is looking for CACs to help educate their communities about Shelter In Place. Bruce would like our CAC to get involved with this project.

The City is working with the schools on all types of emergency plans.

The CAC members discussed wanting to pursue a community project. The group wants to stay active and keep the CAC going. They want to continue working on their issues and help the community with emergency response notification. Shelter In Place kits and weather radios may be something the CAC can get involved with as well. The Working Group is also going to be talking about Emergency Response at its next meeting. They would like to select three notification systems that could work for Reading. They would then like to present their research findings and proposed options to the CAC. It is the goal of the Working Group to work in partnership with the CAC to make this project happen.

The CAC viewed a 5-minute Shelter In Place video that was put together by the ACS and the Metropolitan Sewer District.

Working Group

Suzie Bateman did not have enough time to present the summary report from the Working Group. She provided Bethany with a hard copy that will be attached to the meeting minutes from tonight.

Next CAC Meeting

The next CAC meeting will be a joint meeting with the Louisville CAC on October 12, 2001 from 5:30 - 8 p.m. at the plant. Please review the agenda and RSVP to Linda or Bethany for any of the activities you will be attending. The meeting adjourned at 7:15 p.m.

SUMMARY REPORT

Working Group on Rohm and Haas August 27, 2001

The Working Group on Rohm and Haas' Cincinnati Facility met for its fifth meeting, August 27, 2001, with consultant Ann Green at the Reading Field House. Attending for the plant was Curt Lambert, environmental engineer in the Environmental, Health and Safety Department. Community members attending were: Gene Koetter, Dave and Margie Lehrter, Barb Stall, Margie Stall, Suzie Bateman, and Marilyn Wall and Rachael Belz from Ohio Citizens Action. The following summarizes the status of issues identified at the first working group meeting May 3, 2001.

Trucks parked at plant gate prior to 7 a.m.

Ann Green shared letters sent from Plant Manager Bruce Beiser regarding new signage to prevent trucks from coming onto Bernard Ave. and a letter asking a vendor to not allow their trucks to come that way. She also shared a summary history of truck traffic provided to her by the plant. The group said they appreciate the new signs and recognize that significant progress has been made to correct the problems. They also realize the plant may not be able to prevent all trucks from going the wrong way or coming too early. Gene Koetter said he was told by one driver last week that he was given directions by the plant to come down Bernard Ave. Marilyn Wall shared a story from the August 7th edition of the *New York Times* regarding a pilot project in New York of a power pack used by truckers who want to stay overnight that allows them to have heat or air conditioning without running their engines. She said it was better for the environment and well as quieter.

Recommended Action: No additional action was requested.

Concerns over odors and toxic emissions from the plant

Curt Lambert emphasized the scrubbers are working at the plant. He said the scrubbers are continuously monitored for temperature, pH and how active the scrubber solution is. If any of these parameters is out of range, an alarm is sounded. Curt said the plant has a policy of not bypassing control equipment and employees abide by that policy. For example, production was recently halted because of low scrubber solution inventory, illustrating how plant employees take seriously the need for the control devices.

- Internal survey of employees asking them to identify sources of odors. The survey has been completed. Ideas are being acted upon. Curt provided one example where a mechanic suggested going to sealless pumps in a particular area to reduce emissions and odors. Margie Stall said she was impressed the employees are reporting when they smell odors and are coming up with solutions. Comparison of the current study with one done in 1994-95 will be done shortly.
- Ventilation study for Building 3/3A to reduce mercaptan odors. Curt reaffirmed what he reported at the last meeting that vendors are reporting manpower

shortages that might delay the project. Everyone at the plant is committed to the project, he said. Curt also reminded the group that the odor threshold for mercaptan is so low that there is no guarantee odors can be completely eliminated. He said it was safe to say that there will be a big improvement. He said the plant wants to be a good neighbor and will continue to work on odor problems.

Recommended Action: Curt was asked to continue to keep the group informed of the status of these projects.

Curt said it is possible the chiller project may be delayed because of delays in manufacturing the chiller. He said, originally, the chiller was going to be made in Germany. The problem is that Rohm and Haas requires any equipment in its plants to be certified by the American Society of Mechanical Engineers (ASME) and that wouldn't be done for the German-built equipment. So, the equipment will need to be built in the USA. He anticipated the project could take two months longer

Recommended Action: Curt was asked to keep the group informed of the progress on this project.

Emergency Response Communications

Ann said she wanted to get information from the working group on what they wanted to have happen in terms of emergency response. They agreed they wanted to feel comfortable with the way they would be notified in an emergency and know what they should do. Ann said this could not be done without the emergency responders responsible being involved. She said she thought this would be a good topic to work with the Community Advisory Council (CAC) since the responders were members as were many members of the working group. Discussion followed. Marilyn Wall asked about Transsafe and Plant Safe programs that she understood from a vendor have been used in other Rohm and Haas plants. [Post-Meeting Comment: Morton-Cincinnati EHS representatives are currently investigating the feasibility of using these programs.] After further discussion, it was agreed that the working group would make its next meeting a focused discussion on what they would like to see as improvements in the emergency response system. Kevin Kaiser will be invited to attend so that the group won't be recommending something that can't be done.

Recommended Action: Discussion will continue at the next meeting. Ann will invite Kevin Kaiser (completed).

Ann also reminded the group that she would need to wrap up her work with them by the end of the year. She said she wanted the group to become an active part of the CAC in the future. Discussion followed with several expressing reservations about the effectiveness of the CAC and whether they were actually welcome to attend. Rachael Belz suggested the CAC was the best way to bring about the emergency response changes necessary. Ann said it was important to note that none of the accomplishments of the working group could have been done without Bruce Beiser's commitment and assistance.

Next Meeting

The group agreed to meet on Thursday, October 4 at 6:30 p.m. at the Reading Field House. There will be no meeting in September.



Community Advisory Council

January 17, 2002 Meeting Minutes

Members Present

Bruce Beiser
Rachael Belz
Carol Bullock-Carpenter
Bill Ford
Mike Fremont
Jon Hopkins
Kevin Kaiser
Gene Koetter

Dave Lehrter Margie Lehrter Cheyenne Ritz Bishop Sorrells Barb Stall Margie Stall Marilyn Wall Curt Lambert

Visitor

Gary Era (Rohm and Haas employee)

Facilitator

Bethany Dale

The meeting started at 6:00 p.m. in the second floor conference room at the Rohm & Haas plant. Sandwiches were provided.

Bethany welcomed everyone, reviewed the agenda and asked everyone to introduce him or herself. This was the first meeting of the combined ÇAC and working group members.

Plant Update (Bruce Beiser)

Safety

The plant had five OSHA recordable injuries in 2001. The plant has gone 400 days without having a lost-time injury.

Environment

- The plant closed a consent order with the Metropolitan Sewer District (MSD) and the Ohio Public Interest Research Group regarding wastewater compliance in 1992. The consent order was settled through the National Environmental Law Center. The plant paid \$150,000 to MSD for 10 years worth of accumulated fines. It paid the National Environmental Law Center \$40,000 for their legal fees and expert testimony. As part of the settlement, the plant agreed to a supplemental environmental project. For the project, the plant selected the Mill Creek restoration project and sent them a check for \$70,000.
- The plant had an accidental release of 2,430 lbs. of methyl chloride on 11/19/02 during a 40-minute period. The release was caused by operators leaving a liquid vent line open upon start-up. Engineers discovered it a few days after it happened when they were investigating why the methyl chloride recovery system wasn't operating properly. An incident investigation report has been given to the Ohio EPA, U.S. EPA and Hamilton County. Hamilton County asked the plant to model the release. The model estimated that the highest concentration of methyl chloride caused by the release was 157 parts per

million (ppm). The emergency response planning guideline for this chemical is 400 ppm. Bruce stated the release was very disturbing, but what was more disturbing is that the operators did not report it. This is not acceptable behavior for the plant. The two operators responsible for the release received appropriate disciplinary action.

Q: Did any of the plant alarms go off?

A: Yes. The ambient air monitor did go off. There was not appropriate response to the alarm. The operators did not report the release and attempted to control the release themselves. The operators had reset the alarm after it had gone off.

Q: Is that the largest methyl chloride release the plant has had?

A: Yes. Our recordable releases in the past have been anywhere from 100-200 pounds.

Q: Is the maximum allowable level for an 8-hour period based on adult exposure? A: Yes.

Q: How long had the two operators worked at the plant?

A: One had worked at the plant 12 years and the other 8 years. They had not worked on that process the entire time.

_ In the past two months, the plant had two wastewater permit exceedances — a pH deviation caused by equipment malfunction and an oil and grease exceedance.

The cryogenic chiller project, which will significantly reduce methyl chloride emissions, is still scheduled for completion later this year. Jacobs Engineering was hired to design this new equipment installation. The plant will submit the bid package and cost estimate to corporate the end of January. (POST-MEETING NOTE: THE FUNDING REQUEST WILL NOT BE SUBMITTED TO CORPORATE UNTIL FEBRUARY.) It is estimated to cost \$0.5 million.

A new, three-year wastewater permit was received from MSD.

The RCRA site investigation, managed by Geomatrix, continues at the plant. The environmental impact assessment is due by the end of June. Geomatrix recently took absorbent pillows into the Mill Creek to measure organic contaminants in the creek, both upstream and downstream from the plant. Geomatrix is reviewing the data; the plant does not know the results yet.

Odors (Bruce and Curt Lambert)

- There were three "rotten egg" odor complaints since the November meeting. One occurred in early December and two came in on January 2. The Lehrters and Stalls commented that the January 2 odor lasted several hours and was really bad. Curt updated everyone on the plant's "Odor Plan" to reduce odors. There are three indoor projects going on and one outside project.
 - Odor Source Survey The final odor source survey report has been written by Eric Walker. He was able to identify some interesting trends as to when the odors are noticed. He has made a list of 10 recommendations to eliminate the source(s) of the odors. The CAC expressed interest in inviting Eric to the next meeting to present the results of the odor source survey and discuss his recommendations. Rachael Belz mentioned that she liked reviewing the "pink sheets" that plant employees completed during the odor survey. Bruce said he sometimes issues his own odor complaints as he leaves the plant.
 - Ventilation Project The plant's ventilation project is under corporate review. Someone from corporate recently visited the plant and suggested they evaluate using "spot ventilation." Curt added that if spot ventilation were incorporated

into the ventilation project it would delay the project because they would have to go back and redesign the ventilation improvements. Corporate modeling shows the ventilation improvements could reduce the odors emitted from the building ventilation by an order of magnitude.

Q: If you have spot ventilation, would you be changing from one ventilation

point to several points?

A: The original project is to re-ventilate the building because it is under significant negative pressure. The plant also has ground level exhaust problems in the building. They want to install roof vents or a stack to release the air into higher elevations, which would disperse the air more. The scrubber isn't big enough to take all the ventilation from the building. The plant is trying to control the point sources where it believes there are pockets of odors.

Q: How will you measure the project's success?

A: The plant would have to rely on community input as to whether or not the equipment is working. Sometimes plant employees can't smell the odors as well as the surrounding community because they are accustomed to them.

Q: Have you thought about using carbon filters or something to absorb the odors?

A: The plant tried to use citrus oil to neutralize the odor, but that only masked one odor with another. It didn't solve the problem. The plant tried carbon drums, but they created a fire hazard because of the mercaptan and caustic material on the drums. Mercaptans present a specific problem because of their chemistry and because they are detectable at such low concentrations.

C: Several members commented that when they call about the odors, they get a call back and the response from the plant is, "everything is normal." Bruce said this response doesn't mean the odor is okay or normal. It means the operators have checked their parameters they are responsible for and there is no unusual activity at the plant. Bruce agreed that the response "everything is normal" could be misunderstood and should be explained more clearly.

Q: Are there any other Rohm and Haas facilities that use spot ventilation? A: Yes.

Q: Do you find out which way the wind is blowing when an odor complaint comes in?

A: Yes.

Q: Is the prevailing wind northeast?

A: No, but when odor complaints come in that is usually the wind direction at that time. It is helpful for the plant to know which direction the wind is blowing because operators can draw a line back to a particular area of the plant to try to pinpoint the potential source of the odor.

Ester Project - The plant is modifying a process in which esters are made. The goal is to eliminate one of the extraction steps, which is one potential source of the mercaptan odor. The project may make the ester process more stable and allow the scrubber to operate more efficiently. This project would produce less wastewater. The \$1.7 million capital has been approved. This system should be operational October 1.

Odors from Sewer — The plant is preparing to collect air and water samples from three areas near its sewers. The sample devices should be arriving the week of January 21.

Community Update (Bruce)

The plant recently mailed copies of its December 2001 *Environmental, Health and Safety Update* to neighbors and CAC members. (Copies were also available at the meeting.) One member commented this was the best newsletter the plant has put out.

Employees participated in the Lockland Head Start Adopt-A-Child Christmas program. They adopted 64 pre-school children and took gifts to them during a plant-sponsored

pizza party.

Four employees are participating in the Junior Achievement program in Reading and Wyoming schools and six more are in training.

Security

- Bruce mentioned that security cameras and additional lighting would be placed around the plant fence line.
 - Q: Is the plant controlling the gate near its back lot?
 - A: No, the gate on Reisenburg is a city gate and they should be controlling it.

Trucks

Bruce provided a graph illustrating the progress in after hours truck parking. He said they have been averaging about one early arrival truck a week over the last 8 weeks. He said they haven't had repeat offenders. He is pleased with the improvement, but will continue to work on the problem. He said it is difficult due to the number of independent and consolidated trucking companies.

It was mentioned that the trucks are now parking on Market Street in the Vonderhaar's parking lot. Gene expressed concern about the trucks that are parked in the field house lot during the day. Gene mentioned he sends Bruce and Syd an email when he sees a truck parked outside the gate. Bruce verifies that the trucks Gene reports are on his truck log. Gene said he approaches the trucks and threatens to call the police, which usually gets them to leave. Gene also expressed frustration with the city and its lack of patrolling and enforcing the "no truck parking" signs.

Q: When you prepare the plant's truck update each month, can you report whether or not there are any repeats?

A: Yes, that can be added.

Working Group Update (Marilyn Wall)

Marilyn said the working group has been working on issues related to truck parking, odors, methyl chloride emissions and emergency response. What has worked well for the working group is the fact that the company has become very willing to talk about their plans to improve in these areas.

Shelter In Place Discussion

Bethany distributed a list of potential new CAC members or participants in the community wide Shelter In Place (SIP) campaign that members had given her after the last meeting. Rachael mentioned that we should try to get them involved with the campaign first and then let them decide if they are interested in joining the CAC. Bethany also distributed SIP give-aways that the Alliance for Chemical Safety purchased as part of its campaign.

Kevin is going to get Bethany a city calendar of events. The CAC still wants to have a SIP booth at festivals and city events throughout the year. Bruce mentioned that the Reading Chamber is looking to get more involved in community projects and should be contacted to see if they would be interested in SIP education. Cheyenne Ritz said the environmental club at the junior/senior high school is also interested in helping with the SIP campaign. Kevin said the Fire Department is already working on SIP education. He is presenting the program to the Reading Kiwanis on Feb. 6. He has also done the presentation for city employees as a sort of focus group to gather feedback. He said he could use the CAC's help to contact organizations, schedule some of the activities and man the information booths.

The meeting adjourned at 8:00 p.m.

Next CAC Meeting

The next CAC meeting will be February 14, 2002 from 6:00 - 8:00 p.m. at the plant, in the second floor conference room. We will be discussing the results of the plant's odor source survey and begin planning the Shelter-In-Place community education campaign.



STREET ADDRESS:

FAV (044) 044 0000

arus Government Center 122 S. Front Street Columbus, OH 43215-1099 TELE: (614) 644-3020 FAX: (614) 644-2329

P.O. Box 1049 Columbus, OH 43216-1049

MAILING ADDRESS:

To the citizens of Reading, Ohio:

Beginning in 1996, Hamilton County Department of Environmental Services, HCDOES, has operated a toxic canister unit at 1601 West Street, Reading. The samples taken were collected over a 24 hour time period sampling every twelfth day. Analysis has been performed by the Ohio Environmental Protection Agency, Division of Environmental Analysis for 64 compounds. We would like to take this opportunity to thank you for your involvement in the monitoring project. Several concerns are causing us to relocate the unit: integrity of the sample at the current location and prevalent wind direction in the area combined with the location of the area sources. Because the prevalent wind direction in the area indicate a more southwesterly flow, HCDOES with the support of Ohio EPA is looking to relocate the monitor to obtain a more accurate picture of the toxic compounds as a result of source emissions in the Reading and surrounding areas. From the enclosed map, it is evident that the sources of concern to the citizens of Reading are downwind of your community thus not accurately reflecting data collected at the current site.

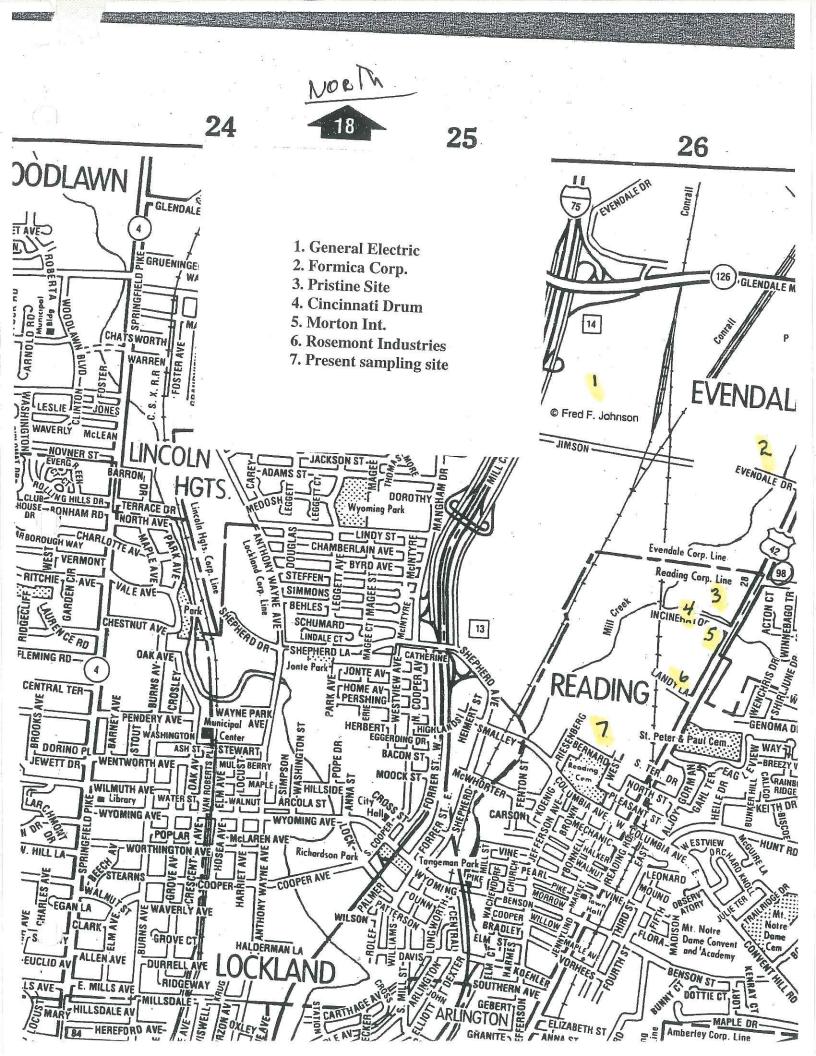
HCDOES is seeking potential sites within the Reading area. Should you have any suggestions on possible locations of the monitor please respond by Thursday, November 29, 2002 to Kerri Kahlenberg, HCDOES (513)946-7738. Any questions or comments concerning the relocation of the unit, should be directed to either myself at (614)644-3624 or Ms. Kahlenberg, HCDOES, We look forward to working together to address the concerns of the citizens of Reading regarding air quality.

Sincerely,

Randy Hock
Randy Hock
Ohio EPA

Division of Air Pollution Control

Bob Taft, Governor Maureen O'Connor, Lieutenant Governor Christopher Jones, Director





"Green AS (Ann)"
<agreen@anngreenco
mm.com>

To: Mirtha Capiro/R5/USEPA/US@EPA

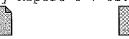
cc: "'SHavely@RohmHaas.com'" <SHavely@RohmHaas.com>

Subject: Cincinnati Working Group

06/19/01 02:14 PM

Hi Mirtha, Syd Havely at Rohm & Haas asked me to contact you regarding my work for them at their Reading, Ohio plant. As I believe you know, I am facilitating/negotiating an agreement among Ohio Citizens Action, nearby residents and the plant regarding several issues. They include truck traffic, odors and emissions. We have met twice with some progress each time. Our next meeting is this Thursday, June 21 at 6:30 p.m. at the Reading Field House near the Rohm & Haas plant. You are certainly welcome to attend. Also, I have attached copies of the reports of the first two meetings for your information. Please let me know if you plan to attend and if you have further questions. I look forward to meeting you and discussing our process. Ann Green, Ann Green Communications. (800-784-4343).

<<Summary Report 6-7-01.doc>> <<Summary Report.doc>>



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SUMMARY REPORT

Rohm and Haas Working Group May 3, 2001

The Rohm and Haas Cincinnati Facility Working Group met on May 3, 2001 with consultant Ann Green, working on behalf of the plant, at the Reading Field House next to the plant. Constituting the Working Group were Bernard Ave. and nearby residents, including members of the CAC. Rachael Belz, SW Director for Ohio Citizens Action, represented Ohio Citizen Action on behalf of the concerned neighbors. A list of those present is attached.

The group discussed current issues between the community and the Rohm and Haas facility in Reading. The following summarizes the issues as articulated by the Working Group and action items identified. Action items are in bold.

Trucks parked at plant gate prior to 7 a.m.

Neighbors are upset about semi-tractor trailers and other trucks delivering materials to the plant that appear at the plant gate during the night prior to making their deliveries at 7 a.m. when the plant allows them entrance. The idling creates both noise and unwarranted exhaust fumes and pollution for the residents close by. Also, neighbors have observed trucks on Bernard Ave., a street prohibiting truck traffic.

In response to these concerns, Ann Green shared a letter Facility Manager Bruce Beiser sent to all trucking companies instructing them not to arrive at the plant gate before 7 a.m. or after 2:30 p.m. The letter states, "Carriers consistently arriving early will be recorded and a formal complaint and request for corrective action filed." To monitor his directive, Bruce has instructed the plant guard to keep a log of trucks not complying with the request.

Neighbors said trucks are ignoring Bruce's request. Some neighbors have been keeping track of infractions.

Recommended Action: Compare residents' logs with the plant records to see if the plant is missing some trucks. Ann will coordinate.

Also, one citizen said he understood the plant had given one trucker instructions to drive down Bernard Ave.

Rohm and Haas Working Group Summary Report from May 3, 2001 Page 2

Emergency Response Communications

Recent incidents at Rohm and Haas and other local facilities have raised concerns about what neighbors would do if the plant had an explosion or chemical release. Neighbor fears and concerns increase the need for a process or mechanism to alert them to an emergency or even false alarm, as occurred recently when the Cincinnati Bomb Squad was called to handle an "unstable chemical" situation. Situations such as this and others can affect the perception of trust, including both the City of Reading and the plant. Neighbors said this should be a joint effort between the City, the plant and the neighborhood.

Recommended Action: The group agreed with Ann to begin discussions about what is needed to begin a dialogue about a community alert system and follow-up notification process in the event of a non-emergency. Ann will discuss potential remedies and responses with Bruce for follow-up by the plant and Working Group. Ann will pursue a number of possible solutions to the issue that the group and the plant can work together to develop a mutually agreeable plan of action, specifically in keeping with the Rohm and Haas Corporate Safety Manual's Emergency Response Plan, which states, "Site management is responsible for developing and maintaining a site-specific plan for responding to emergencies which threaten the safety and health of employees, the surrounding community, or the environment."

Other Issues

Brief mention was made of a couple of other issues. Some citizens wanted more information about the contaminated areas on the plant property. They worried about the possibility of contamination at the adjacent ball fields. They were concerned about groundwater contamination of the drinking water aquifer.

Some members of the working group would like a plant tour.

Recommended Action: Ann will request plant information about on-site areas of contamination and about scheduling a plant tour for the Working Group.

Next Meeting

The group agreed to meet June 7, 2001 at 7 p.m. at the Reading Field House.

SUMMARY REPORT

Working Group on Rohm and Haas June 7, 2001

The Working Group on Rohm and Haas met for its second meeting, June 7, 2001, with consultant Ann Green at the Reading Field House. The following summarizes the status of issues identified at the first working group meeting May 3, 2001.

Trucks parked at plant gate prior to 7 a.m.

Ann Green provided the working group with a report from the plant detailing the number of times a truck has come to the plant early, as monitored by plant guards (attached). Gene Koetter provided his own report as he has observed for comparison. Data seemed to be comparable.

The group continued to be concerned why the plant cannot stop the trucks from coming in early.

Recommended Action: Ann will relay these sentiments to Rohm and Haas.

Concerns over odors and toxic emissions from the plant

Ann reported she met with Curt Lambert and Eric Walker of the Environmental, Health and Safety Department at the plant. Curt provided updates on the plant's odor control plans, as outlined in the attached memo. Eric provided a copy of the plant's odor reporting form for external complaints (attached). He said he was developing an internal reporting form for operators to log daily observations of odors. A study will be conducted from 6/11/01 to 2/1/01, as noted in the memo. This data will be compared to data collected in a survey in 1995 for the purpose of identifying additional sources of odors and prioritizing them.

Recommended Action: Ann suggested community members actively participate in the study by calling the plant during this period with any odor complaints. Call the boiler house at 733-2135.

Two other actions are underway at the plant to reduce odors. A sewer gas vent has been relocated about 30 feet above the ground to help dissipate the odors away from the community. Also, a project to improve ventilation in building 3/3A, as outlined in the memo, is being undertaken. The consulting firm, Yoder Engineering, has been hired to design the project. While a firm timeframe has not been developed, Curt told Ann the plant expects the project to be completed before winter.

Recommended Action: Ann will ask the plant for updates on these activities and report them to the Working Group.

To reduce emissions of methyl chloride, the plant is undertaking a new project.

A memo outlining this project is attached. The plant has hired Jacobs Engineering who is in the process of designing the project. They are interviewing vendors to provide the necessary equipment. Ann was unable to get anyone from the plant to attend the meeting to explain the new process. She provided a brief explanation of the new process, as shared with her by Curt. Essentially, the excess methyl chloride that now goes out a stack would be sent through a chiller that uses liquid nitrogen to strip the methyl chloride out. Curt told Ann the plant hopes to recover over 90 percent of the methyl chloride currently being emitted. Ann reported the amount the plant will be reporting in its TRI data on July 1 for the year 2000 is 31.1 tons of methyl chloride, according to Curt.

The project schedule is as follows, according to Curt:

- Management of Change Process
- Preliminary Design
- Environmental, Health and Safety Review
- Application for Permit to Install
- Process Hazard Analysis
- Final Design
- Appropriation Request
- Issue Purchase Order End of August
- Receive Equipment End of October
- One month for installation
- One month for the process to become fully operations
- Normal operation achieved End of December

Recommended Action: Ann will continue to pursue someone from the plant, consulting firm or vendor to come to the group to further explain the project. She was also asked to ask the plant to provide copies of any dispersion modeling done for the project.

Emergency Response Communications

A copy of the March 2000 document titled "Spill Prevention Control and Countermeasure Plan" was supplied to Ann by the group. Ann was asked to see if this is the latest emergency response plan for the plant and if other information is available on this topic.

Recommended Action: Ann will request the documents from the plant.

Next Meeting

The group agreed to meet on June 21 at 6:30 p.m. at the Reading Field House.

Rohm and Haas Cincinnati Facility CAC Members

Name	Affiliation	Address	City	State	Zip	Phone
	Reading School Board					769-6837 (home)
Bill Apking	President/Apking Janitorial	2247 Pompano Drive	Reading	OH	45215	733-5050 (office)
Suzie Bateman	Neighbor	329 Westview	Lockland	он	45215	733-8650
Bruce Beiser*	Rohm & Haas Plant Manager	2000 West Street	Reading	ОН	45215	733-2179
Carol Bullock-Carpenter	Sts. Peter & Paul Church	1544 Sanborn Drive	Reading	ОН	45215	733-4857
Jim Davis	Neighbor/Employee	217 Bernard Avenue	Reading	он	45215	769-0573
Bill & Polly Ford	Neighbors/Employee	229 Bernard Avenue	Reading	ОΉ	45215	733-4669
Debbie Goodhart	Reading Health Nurse	142 East Crest Drive	Reading	он	45215	842-1677 (work) 615-8344 (cell)
Chief Greg Hilling	Reading Police Dept.	1000 Market Street	Reading	он	45215	733-4122
Jon Hopkins	Neighbor/Employee	1266 Sanborn Court	Reading	ОН	45215	563-2886
Chief Kevin Kaiser*	Reading Fire Dept.	1000 Market Street	Reading	он	45215	733-5537
Gene* and Carole Koetter	Neighbors	202 Bernard Avenue	Reading	ан	45215	554-0329
Dave* & Margie Lehrter	Neighbor	232 Bernard Avenue	Reading	οн	45215	563-2362
Jim Pfennig	Reading Councilman	240 W. Vine Street	Reading	ОΗ	45215	733-3725 (work) 563-6255 (home)
Mike Rahall*	Reading Safety - Service Director	1000 Market Street	Reading	он	45215	733-3725
Earl Schmidt	Mayor of Reading	1000 Market Street	Reading	ОН	45215	733-3725

Rohm and Haas Cincinnati Facility CAC Members

Cheyenne Ritz	Reading Jr. High Science Teacher, President School Environmental Club (7-12)	810 E. Columbia Avenue	Reading	ОН	45215	733-4422
Bishop Donald Sorrells	Christ Temple Apolstolic Faith	325 N. Wayne Avenue	Lockland	ОН	45215	821-9476
Nancy Stall	Neighbor	200 Bernard Avenue	Reading	ОН	45215	733-8398 (home) 733-3725 (work)
Barb & Margie Stall	Neighbors	208 Bernard Avenue	Reading	ОН	45215	733-3441
Linda Stichtenoth*	Rohm & Haas Community Relations/HR Manager	2000 West Street	Reading	ОН	45215	733-2213

^{*} indicates steering team member

CAC Facilitator

Bethany Dale

ETC, Inc. 31 Triangle Park Drive

Cincinnati, OH 45246

phone: 772-7903

Mailing List Only:

Ms. Mirtha Capiro

USEPA Region V

77 W. Jackson Boulevard

Chicago, IL 60604-3590



** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. - 8 p.m.

Thursday, May 8, 2003

Rohm & Haas Plant, Second Floor Conference Room 2000 West Street (Dinner will be provided)

> <u>Topic:</u> Plant Tour*

followed by a presentation given by the Reading Junior/Senior High School Environmental Club

Please let me know by Tuesday, May 6, whether or not you will be attending the meeting. The plant remains under heightened security. You must RSVP for meeting and bring your photo ID. Members who show up for the meeting without notice are likely to be turned away.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany.dale@etc-online.com

*Please wear long pants and closed-toe shoes if you intend to go on the plant tour. Hard hats and safety glasses will be provided.

ENVIRONMENTAL COMMUNITY ORGANIZATION

515 WYOMING AVE. CINCINNATI, OHIO 45215 (513) 761-4003 / FAX (513) 761-4988

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a community and environmental network creating solutions to protect and improve health, welfare, safety and the environment

April 16, 2001

Dear Mirtha,

Thanks for taking time to talk with me today. I am faxing along to you the letters regarding the FOIA CERCLA request. One is my original request, and the other is the reply from the USEPA attorney.

Secondly, the addresses/phones for the three municipal water works neighboring the Morton site which I understand draw from that aquifer.

1. Village of Glendale, 30 Village Square, Glendale OH 45246, 513-771-7200 for the village office, and 513-771-7625 water works pumping station.

2. Village of Lockland, 101 N. Cooper Ave, Lockland OH 45215, 513-761-1124 for both village offices and water works.

3. City of Wyoming, 800 Oak Ave, Wyoming, OH 45215, 513-821-7600 nunicipal offices, 513-821-8044 water dept.

Thank you.

Sincerely,

Karen Arnett

environmental community organization 515 wyoming ave cincinnati, ohio 45215 ph: (513) 761-4003 fax: (513) 761-4988

FROM: 513) 761-4988

5 February 2001

Mr. James Entzminger OCEPP (SC-6J) USEPA Fax 312)886-6064

Dear Mr. Entzminger,

I am writing to you with a FOIA request. I would like to obtain a copy of a report required by CERCLA for a chemical spill. The incident took place at Morton International's Reading Ohio facility, USEPA ID number 000724138, located at 2000 West Street, Cincinnati, Ohio. The spill was on 2 October 1999; a quantity of methyl chloride escaped into the atmosphere.

I am interested in obtaining the documentation surrounding that incident, including but not limited to, a "Response to Request for Information Pursuant to Section 104(e)... for Morton International Inc in Cincinnati Ohio", including all appendices and attachments. This response was submitted to you on the date of 31 January 2000, by certified mail.

In addition, I would like to request listings of any other chemical releases which exceeded the reporting threshold and for which you have documentation.

Thank you in advance for your help in providing me with these documents. If you have any questions or need clarification of my request, please call, fax, or e-mail me.

Sincerely,

Karen Arnett
Environmental Community Organization (ECO)
515 Wyoming Ave
Cincinnati, OH 45215
513) 761-4003, fax 513) 761-4988
eco@env-comm.org



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF: SM-4J

<u>CERTIFIED MAIL</u> RETURN RECEIPT REQUESTED

Karen Arnett 515 Wyoming Avenue Cincinnati, OH 45215

Re: Freedom of Information Act
Request Identification Number: 05-RIN-00712-01

Dear Ms. Arnett:

This letter serves as our response to your Freedom of Information Act (FOIA) request dated February 5, 2001. You requested a chemical spill report for the October 2, 1999, release of methyl chloride at Morton International's Reading, Ohio facility in Cincinnati, Ohio. You also requested listings for any other chemical releases which exceeded the reporting threshold. The report and other chemical release information is available on the internet at www.cpa.gov/erns.. Finally, you requested Morton International, Inc.'s response to our Request for Information under Section 104(e) of CERCLA.

At this time, we are unable to provide you with Morton's response to our information request, because the document has been determined to be exempt from mandatory disclosure by virtue of Exemption 7(A) of the FOIA, 5 U.S.C. § 552(b)(7)(A). Release of the information at this time could reasonably be expected to interfere with ongoing United States Environmental Protection Agency (U.S. EPA) enforcement proceedings. See National Public Radio v. Bell., 431 F. Supp. 509, 514-15 (D.D.C. 1977) (Congress intended that Exemption 7(A) would apply where disclosure may impede any necessary investigation prior to court proceedings): NLRB v. Robbins Tire and Rubber Co., 437 U.S. 214, 232 (1984) (Congress intended that Exemption 7(A) would apply whenever the Government's case in court ...would be harmed by the premature release of evidence or information). As Exemption 7(A) precludes the release of some of the requested information, it is not necessary for me to determine, at this time, the applicability of other FOIA exemptions to this material. Hence, EPA reserves the right to assert any other applicable exemption to this information in the event Exemption 7(A) is no longer applicable. Please refer to the Enclosure for the withheld document. This document has been reviewed pursuant to the discretionary release standard.

Section, at (312) 886-6541.

Sincerely,

For William E. Muno, Director Superfund

Enclosure

Enclosure

DOCUMENT WITHHELD MORTON INTERNATIONAL, INC. CINCINNATI, OHIO

Document

Morton International, Inc.'s Response to 104(e) and appendices

Exemption

Exemption 7(A) disclosure could reasonably interfere with enforcement proceedings

Mirtha Capiro Region 5, USEPA Fax: 312)353-4342

11 Jan 2001

Dear Mirtha,

I am writing regarding the RCRA Administrative Order for Morton Int'l., docket no. R3013-5-00-001. I spoke with you late last year, and placed a FOIA request for documents in the file supporting this investigation.

I don't believe I ever received the preliminary plan submitted by Morton/Rohm & Haas for complying with the order. Would you be able to send me a copy of that, along with any revisions by USEPA?

My questions follow on the admin. Order.

Question 1) What is the formal differenc between an Administrative Order on Consent and and Administrative Order? I notice the change from one to the other in the process of going from draft to final document. What are the implications in enforcement?

Question 2) The final order is requiring a study, but no corrective action. In the AOC draft, I notice requirements for corrective action to "conrol unacceptable human exposures", and to undertake corrective measures necessary to protect human health and the environment from all current and future risks. Is there an intention to require such corrective action after the two-year study period?

Question 3) There was a provision in the preliminary draft for a public comment period on Morton's proposed corrective measures. Did such a public comment period occur, and if so, what were the dates?

I would like additionally to request any document which have been added to your files in the past

Thank you. I look forward to your reply.

Sincerely,

Karen Arnett ECO 513)761-4003/ fax 513)761-4988



6/04/01

Mirtha,

Syd Havely from Rohm & Haas asked me to send you all CAC correspondence. We had our first meeting in February and I have tried to copy everything for you so you can be brought up to speed. Please don't hesitate to call me if you have any questions. Hope I see you at one of our meetings.

Sincerely, Bethany Dale .



Environmental NEWS RELEASE



Technical Contact: Mirtha Capiro (312) 886-7567

Legal Contact: Thomas Nash (312) 886-0552

Media Contact: Karen Thompson (312) 353-8547

For Immediate Release: September 1, 2000

No. 00-OPA194

EPA ORDERS MORTON TO INVESTIGATE HAZARDOUS WASTE AT READING, OH, FACILITY

U. S. Environmental Protection Agency (EPA) Region 5 has recently filed an order against Morton International Inc., for hazardous waste violations at its Reading, OH, facility.

Morton, a chemical manufacturer and hazardous waste generator located at 2000 West St., must investigate the extent of contamination at its plant within 30 days.

Under the Resource Conservation and Recovery Act, EPA and the State of Ohio jointly control the safe handling, transportation, treatment, and disposal of hazardous wastes, from their production to their final disposal.

#



** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. - 7:30 p.m.

Thursday, June 23, 2005

Rohm & Haas Plant Second Floor Conference Room 2000 West Street (Dinner will be provided)

<u>Topics:</u> Plant's 2004 Toxics Release Inventory (TRI) Data

Please let me know by Tuesday, June 21, whether you will be attending the meeting. Guests are welcome.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany.dale@etc-online.com



AGENDA May 26, 2005 6:00 p.m.

Sign-In and Dinner
Introductions
Plant Update
Announcements/Celebrations
Community Partnership Initiative Grant

- Needs Assessment Survey Results
- Review Grant Application
- Discuss Request for Proposals

Members and Guests Members and Guests Bruce Beiser Members and Guests Bethany Dale

Next CAC Meeting: Thursday, June 23 at 6:00 p.m. Topic: 2004 Toxic Release Inventory (TRI) Data



May 26, 2005 Meeting Minutes

Members Present

Bruce Beiser
Mayor Bo Bemmes
Bud Elmlinger
Chief Kevin Kaiser
Sister Joan Krimm
Dave Lehrter
Margie Lehrter
Keith Mesch
Jim Pfennig
Nancy Stall
Tami Todd

Visitors/Guests Present
Barb Griffen, Reading Resident
Kim Brough, Rohm and Haas
Susan Slavely, City of Reading

Facilitator
Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and members had dinner. Bethany then brought the meeting to order by reviewing the agenda and asking everyone to introduce him or herself.

Plant Update (Bruce Beiser) Safety

• There were no injuries this month. The plant (manufacturing sector) is one month away from achieving the milestone of going one year without an OSHA recordable injury.

On May 12, the Reading Fire Dept. responded to a fire alarm caused by a maintenance employee shutting off an air line to the fire suppression system.

Environmental

Sewer and Wastewater

No permit exceedances or deviations.

Air

No permit exceedances or reportable releases.

• The plant did have a fugitive emission of chlorine. (Chief Kevin Kaiser explained the incident, below.)

Last Saturday around 1 p.m., the plant's chlorine sensor, located inside the dome of a railcar, went off. This happened during the City's Blue Star event at the Reading stadium. The Reading Fire Dept. responded to the scene with the plant's Emergency Response Team. Chlorine readings were low and no leak was detected. However, since so many people were outside around the stadium and soccer fields, the Fire Dept. called a Shelter-In-Place and moved people into the field house by the pool. The response teams rechecked for leaks and opened up the process lines. Once the crew confirmed there was no leak, the Shelter-In-Place was over. By this time, many people had already left the field house.

1

The cause of the chlorine sensor going off is believed to be a black hawk helicopter that was in the area for the Blue Star event. Evidently the helicopter took off from the stadium, flew low over the Rohm and Haas plant and then performed stunts for the spectators. When the pilot flew over the plant, the wind created by the helicopter blades made a hose on the railcar move, which jarred and corroded a fitting on the car. Less than 1 gram of chlorine escaped. It is considered a fugitive emission, not a reportable release.

Many people complained about the Shelter-In-Place, but the fire department believes it responded appropriately and according to protocol.

Q: What is the Fire Department's first tier of response?

A: We automatically respond to the scene first. Then, for safety purposes, we proceed with a 300-ft radius of that scene. As we learn more information, we adjust our public response plan. Our concern related to this incident did not go beyond the plant's fence line. We just took that extra step as a safeguard.

RCRA Site Investigation

Nothing new to report.

Odor Complaints

• Two external odor complaints since the last meeting (April 28).

• 5/12 6:50pm rotten egg odor
There was no identifiable process deviation. The scrubber solution was changed out as a precautionary measure.

• 5/25 6:43pm rotten egg odor Plant doesn't think it was the source because the wind was from the WNW at 1.22 mph.

Early Truck Arrivals

• Since the last meeting, there were 12 early trucks. (Trucks are admitted after 6:30 a.m.)

week of 4/25
week of 5/02
week of 5/09
week of 5/16
2 early, 1 before 6:30 a.m.
2 early, 1 before 6:30 a.m.
3 early, 2 before 6:30 a.m.
3 early, 2 before 6:30 a.m.

- Bruce mentioned that on 5/11, a truck arrived at 2:20 a.m. and was told to return at 6:30, but he came back at 6:10. On 5/18, the guard sent a truck away at 5:45a.m. That truck went to pool parking area. The plant guard notified police who sent him away. The plant is still working with individual companies to reiterate the plant's arrival policy of 7:00 a.m. but the process is difficult. The corporation put one company one notice since they repeatedly violate the delivery policy.
- Q: Do other Rohm and Haas sites have issues with truck deliveries?
- A: Yes and no. Some sites have different issues with truckers such as individuals pretending to be enforcement officers trying to collect parking fees.

Methyl Chloride (MeCl) Emissions Reduction

- Efficiencies continue at 98-99%.
- Emissions for May are 1/3 ton.
- Hamilton County is reviewing plant's density correction protocol. The new protocol should allow the plant to get more accurate readings of methyl chloride emissions.
- Hamilton County is reviewing two draft permit revisions to lower the plant's emission levels.

Community Relations

• Junior Achievement —teaching sessions are complete.

• Kim Brough presented the plant's \$1,000 chemistry scholarship to Amy Marts at the schools awards ceremony on May 18. That scholarship is renewable for four years provided the student stays in the chemistry field and maintains good grades.

Review Needs Assessment Survey Results for (CPI) Grant (Bethany Dale)
See attached handouts: Results of 2005 Needs Assessment Surveys, samples of the grant letter, application, and guidelines.

Bethany handed out a summary of the 17 completed needs assessment surveys. After all members reviewed and discussed results, it was voted that the **focus of the 2005 grant should be on youth and/or senior citizens in Reading**. While there seemed to be a high level of interest in a new community center, stakeholders realized that this grant could not effectively help with this need.

The CPI subcommittee will meet next week to finalize the grant application packet and decide which organizations should receive the Request For Proposal package. The deadline for applications will be August 15. The subcommittee will then review the applications and summarize them at the September CAC meeting. Grant finalists will be invited to make presentations to the CAC at its October meeting. The winner will be announced by November 1 and the grant will be awarded in November or December.

The meeting adjourned at 7:40 p.m.

«Title» «FirstName» «LastName» «Company» «Address1» «Address2» «City», «State» «PostalCode»

Dear «Title» «LastName»:

As an organization involved with local youth, we hope you will consider submitting a proposal for funding from the Rohm and Haas Community Partnership Initiative [CPI]. The deadline for grant applications is **June 30, 2004.** The grant will be awarded in November 2004.

Each year, the Rohm and Haas Community Partnership Initiative provides a grant of \$30,000. The Initiative focuses on providing youth with support programs and activities at times when school is not in session. A needs assessment survey of our community leaders identified this focus as the most critical local need. Our target communities are Bristol Borough, lower sections of Bristol Township, the City of Burlington and/or western sections of Burlington Township.

The Initiative will give priority consideration to programs requiring a grant of \$30,000. However, if a viable proposal for \$30,000 does not emerge, proposals for grants of \$5,000-\$25,000 will be considered. Organizations may use the grant in a single year or over multiple years.

If your organization has a program or project that fits the Initiative's focus, please submit a grant application. To help you prepare your application, you are invited to attend the following meeting:

?—Request for Proposal Conference: The purpose of the Conference is to discuss the Initiative's focus and application requirements and answer any questions you may have. The Conference will be held at 4 p.m. at the Rohm and Haas Engineering Building on Route 413 and Old Route 13 in Bristol.

The Initiative's guidelines, grant application form and profiles of the Initiative's grants are attached. Please call me at 215-785-8828, if you would like to attend the Request for Proposal Conference or, if you have any questions about preparing your grant application.

Sincerely,

Richard Williams Manager of Public Affairs

Rohm and Haas Community Partnership Initiative Grant Profiles

The following will give you some perspective on the types of programs we have funded in four Rohm and Haas communities since the Initiative was launched in 1998.

- 1. *Inventors Hall of Fame:* Club Invention [Bristol and Philadelphia, PA] The Program offers students a variety of entertaining, hands-on after school programs that enable them to apply the science and math principles taught in school. Schools may choose from a menu of six after school workshops, which are offered one day a week for five weeks. The grant in each community provides funding for 25 workshops that will reach up to 25 teachers, 50 high school student volunteers and 500 students in grades 2-6 in our target communities. Teachers will be trained to utilize the tools and techniques offered in each workshop.
- 2. Silver Lake Nature Center: Youth Environmental Outreach [Bristol, PA]: The program will target middle and high school students with a variety of opportunities to build environmental stewardship, volunteerism and mentoring skills. Over 45 students will take part in the program, which includes a 5 week Summer Outdoor Adventure. During the school year, teams will meet after school to assess local environmental issues and implement solutions.
- 3. Latino Leadership Alliance/Robert Kelly Family Center: Bristol Borough Future Leaders

 Institute [Bristol, PA] Four, eight week leadership training sessions will be offered to students
 ages 14-18. In addition to the training, participants in the Institutes will be complete 45 hours of
 community work. A resource manual of community volunteer opportunities will also be
 developed and made available to youth in Bristol Borough.
- 4. Family Y of Burlington County: Burlington City Youth Development Initiative [Bristol, PA]: The Initiative is a comprehensive offering of after school activities for local youth. The cornerstone of the Initiative is a Youth Leadership Institute for high school students that teaches students to identify local needs and then plan and implement service projects in their community. The Institute is offered 3 times a year. After students complete the Institute, they work with the Y to implement other parts of the program, which include Spring Learn to Swim, Spring Flag Football, Summer Cheerleading Camp and Summer Basketball plus two additional activities developed by the student leaders.
- 5. Big Brother Big Sisters: High School Bigs [Bristol, PA]: High school students volunteer to serve as Big Brothers or Sisters to at risk elementary school students in Bristol Township and Bristol Borough School Districts. High school "Bigs" are trained and matched with elementary school students who can benefit from a supportive relationship. Bigs and Littles meet after school and engage in one-to-one activities under the supervision of Big Brothers Big Sisters staff.
- 6. Neighborhood Centers: Watch, Learn and Grow [LaPorte, TX]: Approximately 90 students in grades six and seven will participate in an environmental science program designed to increase their interest and responsibility towards the environment. The program will be held onsite at LaPorte Junior High School. It is geared to address state mandated TEKS curriculum and will be measured by the state TAKX performance evaluation. Students will work on a series of projects that best fit their interests and the environmental issues relevant to their community. Two semester-long, after school sessions and two summer terms will be offered.
- 7. Ambler YMCA: YMCA GEMS and KidzLit Clubs [Ambler, PA]: The YMCA Clubs will offer biweekly science and reading enrichment activities at each of 10 YMCA after school programs in the Upper Dublin and Wissahickon School Districts. Teachers will develop program curriculum to complement school district curriculum. At least 150 of children will participate in the Clubs.

- 8. Wissahickon Robotics Program: [Ambler, PA] The Program seeks to broaden student interest in science, mathematics and technology through the construction of a student-designed robot, which competes in several high tech events. Students also utilize a variety of skills to make the program successful including art, writing, research, science, business and presentation skills. The program will reach students from elementary through high school in Upper Dublin and Wissahickon school districts.
- 9. Act II Playhouse: Magic of Theater Program [Ambler, PA]: Approximately 100 students from four area high schools will receive a series of five theater workshops/shows designed to inspire their interest in the theater and provide a behind the scenes view of how a play goes from script to the stage.

10. Montgomery County Community College:

- After School with MC3 [Spring House, PA]: The program offers a series of after school workshops for middle school students in Upper Dublin and Wissahickon School Districts. Students may choose from a variety of courses. Homework help and tutoring are also offered. Students meet one afternoon/week for four weeks. Five sessions are offered each year.
- Summer Career Academy [Spring House, PA]: Middle school students explore careers of the future and learn about the process of selecting a career and the basic traits needed for success. Field trips are taken to various area businesses and organizations to give students an opportunity to see the careers in action. The one-week program is repeated four times during the summer.
- 11. Artreach: Intergenerational Arts Program [Philadelphia, PA]: The program includes a series of six ongoing participatory arts workshops of seven sessions each; an onsite performance to kick off each workshop segment; and, attendance at approximately 16 museum and performance arts events. It addresses two of the Initiatives top priorities after school programs for youth and activities for senior citizens. Over 180 youth and elderly community members will be reached in Bridesburg and Lower Wissanoming
- 12. Philadelphia City Sail: City Sail After School [Philadelphia, PA]: Teamwork, leadership, physics, math and boat building and handling are just a few of the skills students will learn in this maritime program. Approximately 30 middle school students will meet two days a week for six months to work on various projects and participate in field trips. The program culminates with a family sail on the City Sail schooner.
- 13. **Bridesburg Boys and Girls Club**: <u>Teen Scene</u> [Philadelphia, PA]: An organized program was established at the Club under the supervision of a Teen Scene Coordinator. The program provides local teens with a place to go after school and on weekends as well as a wide variety of activities including community service projects, educational and vocational support programs, social and recreational activities and workshops on teen issues.
- 14. Bridesburg Cougars/Bridesburg Recreation Center: Registration Reductions and Capital Improvement Program [Philadelphia, PA]: A campaign was launched to increase membership in the Cougars, a local youth athletic organization, by 30%. A key component of achieving their goal is to reduce the cost of membership by 50% over the next five years to make participation in athletic activities possible for more families. Capital improvements were also made to the fields and facilities and equipment purchased for the athletic programs. A Computer Center is being established at the Recreation Center to be used by youth in the after school program as well as other children and teens in the community.
- 15. National Inventor's Hall of Fame: Camp Invention [Deer Park, TX]: Camp Invention is a handson creativity and science enrichment camp that will be offered to approximately 180 students in grades 2-6 in the Deer Park ISD schools. The interactive camps invite children to use their imaginations and encourage teamwork, creative problem solving and inventive thinking. A minimum of 18 teachers from the district and 12 junior and high school student instructors will

- lead the Camps, which will run six weeks in succession between June and July at Deer Park's Outdoor Learning Center.
- 16. Cane Run Community Schools Program: After School Arts Program: [Louisville, KY] The program offers elementary through high school students in the Cane Run schools a place to go after school to experience the arts. Students can choose from a full array of arts and cultural activities including dance, drama, music, and visual arts.

The Rohm and Haas Community Partnership Initiative Grant Application

Application Deadline: June 30, 2004

Overview of the Initiative: The Rohm and Haas Community Partnership Initiative will contribute up to \$30,000 to the program best positioned to provide children and teens with support programs and/or activities at times when school is not in session including after school hours, weekends and/or summer break. The Initiative's target communities are Bristol Borough, lower sections of Bristol Township the City of Burlington and/or western sections of Burlington Township. Our priorities include youth development, youth activities and recreation, educational enrichment and community beautification. Priority consideration will be given to specific programs or projects that:

- Address a demonstrated need within our area of focus
- Are structured and have adult supervision
- Have a clear and measurable plan for achieving long term impact
- Reach a large and diverse segment of the youth living in our target communities
- Are sustainable after the conclusion of the Initiative's grant.

<u>Directions for Completing Your Application</u>: The information you provide on this application should help us understand how your program or project will impact the Initiative's focus and priorities. Before completing this application, please check the eligibility requirements listed in <u>Question #12</u> to be sure your organization qualifies for consideration. If your organization is eligible, you may submit your application using this form or prepare your own application. If you use your own application, please be sure to follow the same format and complete the questions in the order they are presented.

Please note: Your application must be limited to no more than 4 pages and received by **June 30, 2004** to be eligible for consideration.

- A. Organization Information: Please tell us about your organization.
- 1. Date
- 2. Name of Organization
- 3. Phone E-mail

Fax

- 4. Address
- 5. Contact Name/Title
- 6. Purpose of Organization

7. Brief History of Organization

9.	Number of People Served Each Year
В.	<u>Proposal Information</u> : Please describe the specific program/project that you would like the Initiative to support.
1.	Title of program/project for which a grant from the Initiative is requested:
2.	Name and title of the person who will be responsible for managing the proposed program/project
3.	What geographic community will benefit from this program/project? [The Initiative targets Bristol Borough, lower sections of Bristol Township, the City of Burlington and/or western sections of Burlington Township.]
4.	Why is the program/project needed? [Your proposal must demonstrate that the program/project is addressing a high priority need in the target community]
5.	What are the purpose and objectives of the program/project and the expected results? [Please keep in mind the Initiative's focus and priorities.]
6.	What is the timetable for the project? [The grant may be utilized in a single year or multiple years.]
7.	How will you measure results and what is the timetable for measurement?
8.	What is the grant amount you are requesting from the Initiative? \$
9.	Budget Allocations
T) y	oe Amount Purpose
	ministration/General
	gram/project Costs

Geographic Area Served by Organization

Equipment/Supplies/Facilities
Fund raising

Other Total 10. What other sources of funds are supporting the program/project or are being solicited? Please include the type of support and the amount.

Source of Funds	Type of Support	Committed or Solicited Support?	Amount
			THE STATE OF THE S
			AAA
		THE PROPERTY OF THE PROPERTY O	

- 11. How will you sustain the program/project after the conclusion of the Initiative's grant?
- 12. Please check the appropriate answers below.

Category	Yes	No-
Eligible organizations must be able to answer "yes" to tax status. If you are a Religious or National Organization, you must be able to check "yes" confirming that your organization fits the criteria described for your category		
Tax status is non-profit (501-C3)		
If Religious Organization: Will your project be used by the community on a non-sectarian basis?		
If National Organization: Do you have a local presence in our target community?		***********
Fraternal Organization		
Entertainment Group		
Endowment Fund		
Veterans Organization		
Labor Organization		
Organization requesting good will advertising		
Individual		
Political Party or candidate for public office		
Special events (one-time/short term events such as walk-a-thons or dinners)		
Scholarship support organization		

C. Please enclose

- Copy of IRS 501c3 Tax Exemption Ruling or Determination
- Current Audited Financial Statement
- Membership list of your Board of Directors
- You may also enclose copies of brochures, annual reports and other materials that you think would be helpful in considering your request.

To be considered, this application must be signed by your organization's chief executive. By signing the application, the chief executive is approving the application and certifying that the information contained in this proposal is accurate to the best of his/her knowledge.

(Signature and Title of your organization's chief executive)

Please call Richard Williams, Rohm and Haas Manager of Public Affairs, at 215-785-8828, if you have any questions regarding the Initiative. Your completed application should be sent to:

Rohm and Haas Community Partnership Initiative P.O. Box 219 Bristol, PA 19007 Attn.: Richard Williams



** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. – 7:30 p.m.

Thursday, May 26, 2005

Rohm & Haas Plant Second Floor Conference Room 2000 West Street (Dinner will be provided)

<u>Topics:</u> Review Needs Assessment Results for Community Partnership Grant

Please let me know by Tuesday, May 24, whether you will be attending the meeting. Guests are welcome.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany.dale@etc-online.com



AGENDA April 28, 2005 6:00 p.m.

Sign-In and Dinner
Introductions
Plant Update
Announcements/Celebrations
CPI Grant Update
Plant's EHS Management System

Members and Guests Members and Guests Bruce Beiser Members and Guests Bethany Dale Eric Walker

Next CAC Meeting: Thursday, May 26 at 6:00 p.m. Topic: Review CPI Grant Needs Assessment Results & Review Request For Proposals



Visitors/Guests Present

Barb Griffen, Reading Resident

Stacy Wegley, Ham. County Dept. of Health

Eric Walker, Rohm and Haas

April 28, 2005 Meeting Minutes

Members Present

Rachael Belz
Bruce Beiser
Carol Bullock-Carpenter
Bill Ford
Kevin Kaiser
Curt Lambert
Dave Lehrter
Margie Lehrter

Margie Lehrter Keith Mesch

Dan Milz

Jim Pfennig

Earl Schmidt

Barb Stall

Margie Stall

Nancy Stall Tami Todd

Facilitator

Facilitator Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and members had dinner. Bethany then brought the meeting to order by asking everyone to introduce him or herself, and reviewing the agenda.

Plant Update (Bruce Beiser)

Safety

• One OSHA recordable injury – Research technician caught his thumb in pneumatic press. There were safety controls on the press, but somehow the technician bypassed those controls. The plant (manufacturing sector) has gone 300+ days since last injury.

• There were 2 contractor incidents. A mechanical contractor developed a skin irritation from prolonged contact with a mercaptan. An electrical contractor incurred an injury when saw cutting conduit and the material sprayed out and was inhaled. These incidents led to new procedures requiring contractors to wear protective equipment and face shields.

Environmental

Sewer and Wastewater

No permit exceedances or deviations.

Air

• No permit exceedances or reportable releases, but the plant did have a small methyl chloride release of 0.1 lb from a leaky gasket.

RCRA Site Investigation

Nothing new to report.

Odor Complaints

- Four external odor complaints since the last meeting (March 24).
 - 3/29 9:20am mercaptan odor
 - 4/1 7:59am rotten egg odor
 - 4/13 8:15am rotten egg odor
 - 4/15 6:08pm unknown odor
- Two internal odor complaints since the last meeting (March 24).
 - 4/9 1:50pm bleach odor
 - 4/13 6:10pm unknown odor

Other EHS

- Two off site events.
 - On April 4, a dust cloud came onto plant from across RR tracks. Unsure of source.
 - On April 14, a smoke cloud came over the plant from Cincinnati Drum Co. and resulted in lab evacuation.
- Process development for waste water recovery (odor reduction project) is underway.
 The chemistry looks viable and the plant is working on optimization and equipment issues.

Early Truck Arrivals

- Since the last meeting, there were 12 early trucks. (Trucks are admitted after 6:30 a.m.)
 - week of 3/28 5 early, 2 before 6:30 a.m.
 - week of 4/4 5 early, 1 before 6:30 a.m.
 - week of 4/11 2 early, 0 before 6:30 a.m.
 - week of 4/18 0 early
- Bruce mentioned he thinks many of the trucks are arriving early due to new rules that limit the amount of time truck drivers can be on the road. The plant is still working with individual companies to reiterate the plant's arrival policy of 7:00 a.m.

Methyl Chloride (MeCl) Emissions Reduction

- Efficiencies continue at 98-99%.
- Emissions for the past 12 months are 6 tons. Goal is 5 tons/year.
- Plant's permit modification to be designated as a "synthetic minor source" is being reviewed by corporate.

Community Relations

- Clean-up Reading The plant made a financial donation and provided 6 volunteers.
- Junior Achievement 3 employees currently teaching.
- Plant received one application for the chemistry scholarship.
- Inquiry made for teacher candidates for the TIE Conference at Miami University. The plant will sponsor two teachers by paying conference fees and for substitute teachers while they are at the conference.

Community Announcements

• Carol Bullock-Carpenter thanked the plant for its contribution of \$250 to Clean-Up Reading and for the six employee volunteers who cleaned up Galbraith Rd. in the rain.

Responsible Care/EH&S Management System Presentation (Eric Walker)

Eric distributed copies of his PowerPoint presentation for members to follow along during the meeting. Please use his handouts as a summary of his presentation.

- Q: How many internal audits does the plant go through each year?
- A: One for the environmental system and two for the plant's quality program, ISO 9001. These are rigorous audits.
- Q: Do other Rohm and Haas facilities have EH&S Management Systems like this one?
- A: Yes, other sites follow this same structured approach.
- Q: Does the project team decide on the EH&S project rankings together or is that done individually by team members?
- A: The team convenes and ranks the aspects together over the course of several meetings.
- Q: How much time do you have for a pH excursion before it triggers a violation by MSD?
- A: The time frame differs depending on the pH. The lower the pH the less time because this type of discharge would be more acidic.
- Q: How does the plant know when there is a pH excursion?
- A: The plant has three pH meters at the west outfall. The plant also has two compartments in the tank that are agitated, and when the pH gets low, a neutralizing solution is automatically added. There are times when something happens and the neutralizing solution runs out or can't keep up with the pH. We are going to install an early warning alarm that will go off when the pH is on its way down to 6.0.
- Q: How many pH excursions did the plant have last year?
- A: The plant had about four excursions from late 2003 and through 2004, but none were of reportable quantity. The plant counts every excursion even if they don't have to be reported. Normal pH is about 8.0. The plant has not had any excursions in 2005.
- Q: On a significant aspect ranking, do those rankings take progress into consideration?
- A: Yes. The numbers (rankings) are assigned once a year and will come down from year to year as progress is made on a particular aspect.

Roundtable Meeting Planning for Community Partnership Initiative (CPI) Grant Bethany recapped the results of the CPI community roundtable meeting, which was held on March 31. About 40 community leaders were in attendance to hear about the grant process, the timeline, and to brainstorm community needs in Reading that could be addressed though a grant of this type. Visitors were given the needs assessment surveys and asked to mail them back. So far, we have received 14. Bethany also said that CAC members should complete the needs assessment survey if they haven't done so already. The CAC will review the survey results at next month's meeting to determine the focus of the grant, discuss the Request For Proposals, and determine which organizations the RFP should be sent to.

The meeting adjourned at 7:20 p.m.

Responsible Care / Environmental, Health and Safety Management System (RC/EHSMS)

Rohm and Haas Chemicals LLC Cincinnati Plant

ROHM

Discussion points:

- √What is a RC/EHSMS
 - Purpose
 - How it works
- ✓ RC/EHSMS CY2005 Significant Aspects

- ✓ Examples of CY2005 RC/EHSMS Objectives and Targets
- ✓CY2005 Scheduled events

ROHM

EHS Management System

- ✓ A formal set of policies and procedures that define how an organization will evaluate, manage, and track its environmental, health, and safety impacts. Includes all relevant corporate standards, legal requirements (e.g. OSHA, EPA, etc.) and industry codes of practice.
 - · Cincinnati facility has a total of 13 procedures.

ROHM

Responsible Care Management System(RCMS®):

In the US, Responsible Care® is the American Chemistry Council's (ACC) comprehensive environmental, health, safety and security performance improvement initiative.

The RCMS includes requirements for:

- policy and leadership
- planning
- · implementation, operation and accountability
- · performance, measurement and corrective action
- · management systems review.

All members of the <u>American Chemistry Council</u> are required to apply the RCMS to their operations.

ROHM

Responsible Care Management System(RCMS®):

Companies may choose from two certification options:

- RCMS certification, which verifies that a company has implemented the Responsible Care Management System
- 2. RC/14001 certification, which combines RCMS and ISO 14001.

РОНМ

Cincinnati Site Environmental, Health, Safety, and Sustainable Development Principles

- ✓ Core principle of the RC/EHSMS.
- ✓ Posted throughout facility.
- ✓ All visitors and contractors are required to read the policy during the orientation.

ROHM (

Facility RC/EHSMS Project Team

- ✓ Development of a RC/EHSMS Project Team.
 - Team composed of representatives from the various departments of the facility.
 - · Identify, rank and determine significant aspects

- Identify targets and objectives
- Develop and review procedures.

10 people

ROHM

Definitions:

Aspect: the potential hazards or risks associated with the Cincinnati plant activities, products, raw materials, and services which may result in adverse impacts to our employees, contractors, customers, community or environment.

Significance: having or can be expected to have a major adverse or beneficial impact on the workplace, environment or community.

ROHM

Purpose of the RC/EHSMS

To continually improve in all aspects of EH&S.

- ✓ Identify all aspects that have negative effects on EHS and security (e.g. safety issues, employee exposure, air emissions, odor issues, etc.)
- Provide ranking for all aspects based on significance: the most severe being ranked the highest.
- Assign objectives/targets (e.g. capital projects) to reduce or eliminate the negative effects based on significance.
- ✓ Self-Audit and provide a Management Review for effectiveness, annually.

ROHM HAAS

Prioritizing Aspects/Impacts

- ✓ Severity of Impact -- Consequences
 - 1- minimat, 3 minor displeasure, 5 slightly, 8 obvious attack, 10 severe
- ✓ Importance of Impact Frequency of occurrence
 - 1 negligible, 3 small, 5 average, 8 large, t0 very large
- ✓ Level of Control of the Impact
 - 1 completely under control, 3 satisfactory and maintained, 5 could be improved, 8 - unsatisfactory, 10 - ineffective or nonexistent

Example: Discharge Conventional Wastes in Industrial Wastewater (Severily 8) * (Frequency 8) * (Control 8) = 512

HARS

-) anything over 450 is automatically Significant

Significant Aspects

- ✓ Emission of Volatile Organics (500)
- ✓ Emission of Hazardous Air Pollutants (500)
- ✓ Discharge Conventional Wastes in Industrial Wastewater (pH Control) (512)
- ✓ Migration of Groundwater to the Mill Creek (640)
- ✓ Storm Water Discharge to MSD (512)
- ✓ Updated Procedures (250)

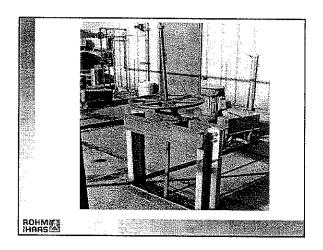
ROHM (

If vanking is below 450, project kam can still include it an significant aspect list

Examples of Objectives and Targets

- ✓ Aspect (Environmental):
 - Discharge Conventional Wastes in Industrial Wastewater
- ✓ Objective:
 - Reduce pH violations associated with the West Sewer.
- ✓ Identified Action:
 - · Automation of outlet gate valve at West sewer outfall.
- ✓ Expected Completion Date:
 - June 2005
- ✓ Objective update:
 - Actuator equipment and valve stems have been ordered.

MHOS



Examples of Objectives and Targets

- ✓ Aspect (Environmental):
 - Migration of Groundwater to the Mill Creek
- ✓ Objective:
 - Improve the collection efficiency of the French Drain system.
- ✓ Identified Actions:
 - Identify the various options which would increase efficiency of groundwater collection system.
 - Select most feasible option.
 - Install necessary equipment and implement recommendations and
- ✓ Expected Completion Date:
 - December 2005
- ✓ Objective update:
 - Option has been identified to increase efficiency of French drain. CH2M Hill has identified several uses of additional groundwater

Examples of Objectives and Targets

- ✓ Aspect (Environmental):
 - Storm Water Discharge to MSD
- Objective:
 - Delay facility storm water from entering the city wastewater outfalls during high rain events,
- ✓ Identified Action:
 - Replace selected combined sewer lines with a larger diameter pipe, which will prevent storm water from heavy rain events from backing up the sewer system.
- ✓ Expected Completion Date:
 - December 2005
- ✓ Objective update:
 - · Jacobs engineering has submitted drawings to MSD.
 - PTI has been completed by Jacobs and facility personnel and is awaiting review by MSD.

Examples of Objectives and Targets

- Aspect (Integrates both responsible care and product stewardship):
- Sustainable Development Goals
- ✓ Objective:
 - Reduce energy and/or water usage.
- ✓ Identified Action:
 - · French drain improvement project.
 - Boiler controls
- ✓ Expected Completion Date:
 - June 2005
- ✓ Objective update:
 - Second boiler is scheduled to be completed by May.
- Controls ratio of gas to oxygen, electronic as opposed to pneumatic.

CY2005 Scheduled Activities

- ✓ Internal audit of RC/EHSMS:
 - . Completed on March 22 24
 - 13 total findings, majority were procedural changes.
 - Prepare for Corp Audit in early October 2005
- ✓ Management review:
 - Scheduled for May 6, 2005.
 - Review RC/EHSMS systems and internal audit findings in entirety with
- ✓ Development of CY2006 aspects and objectives/targets:
- Meeting set for July 2005, prior to annual capital budgeting meeting.

Responsible Care/Environmental, Health and Safety Management System

EHS-1010	Environmental, Health and Safety Management System	
EHS-1010-A01	Responsible Care/EHS Identification and Prioritization of EHS Aspects and Impacts	
EHS-1010-A02	Register of Environmental Aspects	
EHS-1010-A03	Register of Health (IH) Aspects	
EHS-1010-A04	Register of Safety Aspects	
EHS-1010-A05	Register of Significant Aspects	
EHS-1010-B01	Legal Requirements, Corporate Standards, and Industry Codes of Practice	
EHS-1010-C01	EHS Management System Objectives and Targets	
EHS-1010-D01	Responsible Care/EHS Management System and Periodic Reviews	
EHS-1010-E01	EHS Management System Internal System Audits	
EHS-1010-F01	Responsible Care/EHS Record Retention	
EHS-1010-F02	Approval of Retention Format	



Cincinnati Site Environmental, Health, Safety, and Sustainable Development Principles

Consistent with the Rohm and Haas Company's established values, which include concern for our employees, neighbors, and customers, I wish to reaffirm our position regarding the environment, health, safety, security and sustainable development.

We will strive to ensure that our operations and products meet the needs of the present global community without compromising the ability of future generations to meet their needs. We will integrate economic growth, environmental protection and social responsibility as important considerations into business decisions.

We will ensure our worldwide operations and products are free from significant risks to the health, safety and security of our employees, customers, carriers, distributors, the general public and to the environment.

We will meet or exceed all applicable laws and regulations, participate in voluntary initiatives such as Responsible Care® and strive for continual improvement in our Environmental, Health, Safety, Security and Sustainable Development performance.

We will provide our employees with a safe workplace and support their efforts to work safely. Our goals are zero incidents, injuries and illnesses.

We will strive to eliminate or reduce emissions, discharges, and wastes from every stage of our operations.

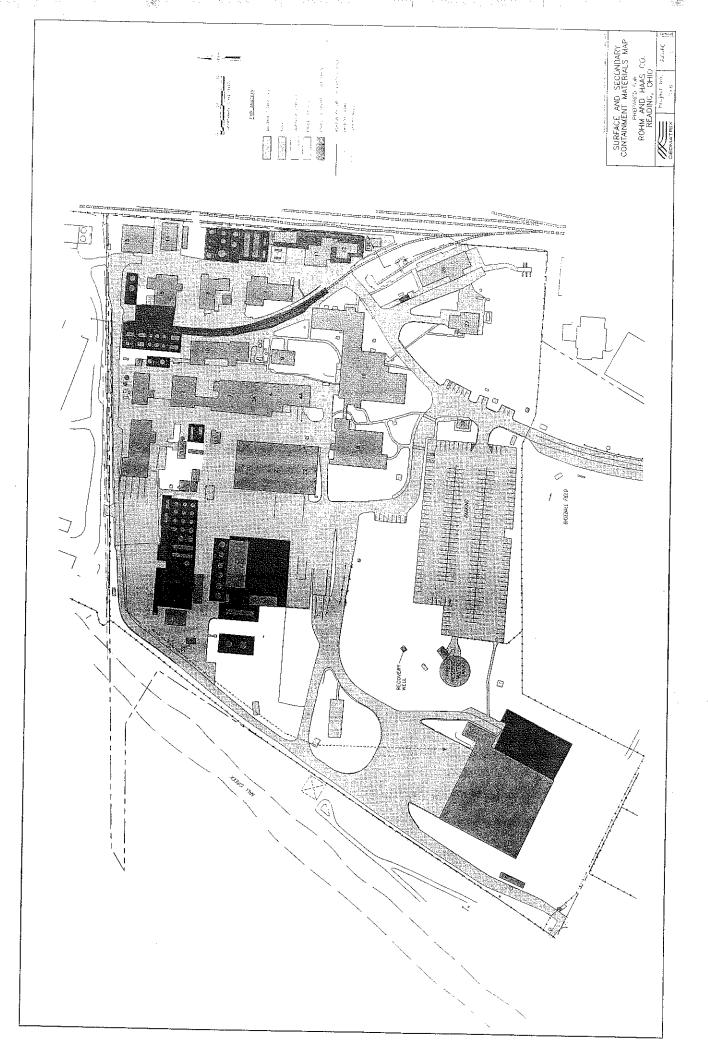
We will communicate, listen and be responsive to our employees, customers, neighbors, and governments, and we will share information concerning potential hazards resulting from our operations or our products.

We will ensure that policies, procedures and adequate resources are in place to implement these principles.

All employees and contractors will be aware of these principles and incorporate them into the conduct of their jobs. We will audit our performance and the Corporate EHS Audit Team will monitor our commitment and progress.

Bruce E. Beiser, Plant Manager

November 3, 2004 Date





** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. - 7:30 p.m.

Thursday, April 28, 2005

Rohm & Haas Plant Second Floor Conference Room 2000 West Street (Dinner will be provided)

<u>Topics:</u>
Plant's Environmental, Health & Safety (EHS) Management System
Presented by Eric Walker

Please let me know by Tuesday, April 26, whether you will be attending the meeting. Guests are welcome.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany.dale@etc-online.com



AGENDA March 24, 2005 6:00 p.m.

Sign-In and Dinner
Welcome and Introductions
Plant Update
Announcements/Celebrations
New Tasks - Odor Reduction Project
CPI Grant - Community Meeting Planning

Members and Guests Members and Guests Bruce Beiser Members and Guests Curt Lambert Members and Guests

Upcoming Meetings

- CPI Community Roundtable Meeting: Thursday, March 31 at 6:00 p.m.
- Next CAC Meeting: Thursday, April 28 at 6:00 p.m.
 Topic: Plant's Environmental, Health and Safety Management Plan



March 24, 2005 Meeting Minutes

Members Present

Rachael Belz
Bruce Beiser
Carol Bullock-Carpenter
Bud Elmlinger
Curt Lambert
Margie Lehrter
Nancy Stall

Visitors/Guests Present

Kim Brough, Rohm and Haas Barb Griffen, Reading Resident Melanie Lennon, Rohm and Haas Sandy Schoenberger, Rohm and Haas

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and members ate dinner. Bethany then brought the meeting to order by asking everyone to introduce him or herself, and reviewing the agenda.

Plant Update (Bruce Beiser)

Safety

No OSHA recordable or first aid injuries this month. Last recordable injury was 273 days ago.

Environmental

Sewer and Wastewater

No permit exceedances or deviations.

South sewer rerouting project is complete, except for new landscaping.

• Plant is upgrading old sections of the sewer system this summer, which is expected to cost \$850,000.

Air

No permit exceedances or reportable releases, but the plant did have two minor releases.

- On March 12, the plant had a methyl chloride release of less than 5 pounds due to a

cracked weld on a small fitting.

- On March 18, less than one pound of chlorine was released due to the packing on a rail car valve leaking. The valve was tightened and the leak stopped. We are working to find out why the packing on the railcar was loose.

Note – The plant installed a portable chlorine sensor in January on the inside dome of the railcar. The sensor went off when the small amount of chlorine was released in March.

RCRA Site Investigation

• Corporate is obtaining bids from local contractors to conduct the risk assessment.

Odor Complaints

• Plant received two odor complaints since the last meeting (February 24).

- March 13, at 9:40 a.m., unidentified odor reported. Wind was from the North at 7.6 mph.

- March 21, at 5:49 p.m. rotten egg odor reported. Wind was from the North at 5.4 mph.

• The plant investigated both complaints and found no assignable cause.

Early Truck Arrivals

• Since the last meeting, there were five early trucks.

- Quality Carriers 6:00 a.m., refused to leave and parked by the stadium

- Pohl 6:00 a.m. delivery, repeat offender

- Safeway 6:45 a.m. delivery, admitted into plant upon arrival Schneider 6:32 a.m. pick up, admitted into plant upon arrival
- Safeway 6:41 a.m. delivery, admitted into plant upon arrival

Methyl Chloride (MeCl) Emissions Reduction

Efficiencies continue at 98-99%.

• Emissions for the first two months of 2005 are 2,125 lbs, of which 745 lbs is actually nitrogen and methane and about 1,380 lbs is actually methyl chloride. This is equal to 4-5 tons/year of emissions.

Plant will be submitting a permit application to be designated as a "synthetic minor

source." Permit should be issued in early 2006.

Community Relations

• The Ohio Chemistry Technology Council presented an award to Bruce Beiser and Keith Mesch, plant quality control and EHS manager, on March 14 in Columbus for the plant's EHS/security performance in 2004. The award is hanging on the wall in the conference room.

New Tasks To Odor Reduction Project (Bruce Beiser)

Plant chemist s and engineers are experimenting with ways to reduce the mercaptan content of the wastewater from the plant's ester process, which goes into the sewer system and can emit fugitive odors through manholes.

One of the lab chemists is exploring a concept to use the wastewater from the ester process in place of fresh water in the stabilizer process. This substitution allows the mercaptan to react and stay in the product. This would replace the material that is ordinarily added post-operation. This may lead to a 90% reduction of mercaptan in the wastewater.

Right now the focus is to determine if this operational change would have an adverse affect on product quality. If this works, the plant will install a surge tank to catch the wastewater from the ester process and hold it to use as make up water in the stabilizer process. The plant would then react the material out instead of recovering it. Bruce is confident the plant will be able to do something with this idea, but isn't sure to what extent yet. This would reduce the odors in the wastewater that can rise in the sewer as water leaves the plant.

Comment: The CAC expressed that this sounded like a good improvement.

Q: Do your chemists typically get involved in reduction projects like this?

A: Yes. Even in new product development, the chemists look at sustainability and how to reduce the impact to the environment.

Q: How are you doing the trial work now?

A: We are doing it in batches in the laboratory bench.

Comment: In the last two years, the plant has reduced its air emissions of volatile organic compounds by 90%.

Roundtable Meeting Planning for Community Partnership Initiative (CPI) Grant

CAC members discussed the upcoming CPI community roundtable meeting, which will be held at 6:00 p.m. on March 31. The purpose is to educate the Reading community leaders and officials about the grant process and timeline, and brainstorm community needs in Reading that could be addressed though a grant of this type. Members committed to attending the meeting to help facilitate the process. Bethany reviewed the agenda for the roundtable meeting and discussed the supplies/handouts that will be provided.

CAC History (Margie Lehrter)

Margie Lehrter took a few minutes to tell tonight's visitors and new CAC members how the CAC got started, the issues it has been working on, and the progress made to date. Margie said the plant has improved a lot and is really trying to work with the community, who still has concerns about the plant chemicals and odors. The CAC is a good place to hear about the community.

Bruce added that both sides of the table have credibility and can understand the others' point of view.

Rachael said that the success of the CAC can be traced back to Bruce and Rohm and Haas' corporate office taking the neighbor's concerns seriously. This has been a unique situation where everyone has truly worked together.

The meeting adjourned at 7:20 p.m.



** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. - 7:30 p.m.

Thursday, March 24, 2005

Rohm & Haas Plant Second Floor Conference Room 2000 West Street (Dinner will be provided)

Topics:
Odor Reduction Project - New Tasks
CPI Grant Community Meeting Preparation

Please let me know by Tuesday, March 22, whether you will be attending the meeting. Guests are welcome.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany.dale@etc-online.com



AGENDA February 24, 2005 6:00 p.m.

Sign-In and Dinner
Welcome and Introductions
Plant Update
CPI Subcommittee Report
Announcements/Celebrations
Emergency Response Community
Education Planning

Members and Guests Members and Guests Bruce Beiser Sister Krimm Members and Guests Members and Guests

Next Meeting: March 24, New Tasks for the Odor Reduction Plan



February 24, 2005 Meeting Minutes

Members Present

Karen Arnett
Bo Bemmes
Bruce Beiser
Bill Ford
Chief Kevin Kaiser
Sister Krimm
Curt Lambert
Dave Lehrter
Margie Lehrter
Tami Todd

Visitors/Guests Present
Sandy Schoenberger, Rohm and Haas

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and members ate dinner. Bethany then reviewed the agenda and brought the meeting to order.

Plant Update (Bruce Beiser)

Safety

No OSHA recordable or first aid injuries this month. Last recordable injury was 245 days ago.

Environmental

Sewer and Wastewater

- No permit exceedances or deviations.
- South sewer rerouting project is complete, except for new landscaping.
- The Metropolitan Sewer District corrected the plant's surcharge rate, which led to a \$64,000 credit over the last three months.

Air

No permit exceedances or reportable releases.

RCRA Site Investigation

Nothing new to report.

Odor Complaints

- Plant received two rotten egg odor complaints since the last meeting (January 27).
 - January 27, at 4:30 a.m. reported by Gene Koetter, but called in by Margie Lehrter.
 - January 28, at 6:00 p.m. reported by Margie Lehrter.
- An investigation was initiated last month after the plant received a high number of six odor complaints in January. Curt Lambert discovered that some had no apparent cause, while others seemed to correspond with instances where the bacterial solution in the odor scrubber was not recharged. Operators were occasionally failing to add the

Methyl Chloride (MeCl) Emissions Reduction

• Efficiencies continue at 98-99%.

• Continue to troubleshoot the dryers and dew point analyzer.

• Density analysis of vent gas indicates a concentration of 65% methyl chloride. The balance is nitrogen and some methane. Therefore, the 1,000 pounds emitted in January was actually around 650 pounds of methyl chloride, which is equal to 4 tons/year.

Community Relations

• Site held a 5th Annual Black History Month Celebration. Included in the event were a children's essay contest on Great African Americans of the Past Century and a poster contest. (Bruce Beiser has a list of the winners if anyone is interested.)

The Ohio Chemistry Technology Council will present an award to Bruce on March 14

in Columbus for the plant's EHS/security performance in 2004.

Additional Comments/Announcements/Celebrations

 Cincinnati Drum's Title V permit is up for renewal. If Rohm and Haas employees notice smoke or odors coming from that site, as they have in the past, they should call the Hamilton County Dept. of Environmental Services. The new permit states their burnerator incinerator will not release any objectionable odors. Rohm and Haas should be aware of that new clause and report any problems.

Community Partnership Initiative (CPI) Subcommittee Report (Sister Joan)

• The subcommittee held its first meeting on February 17 at Mt. Notre Dame Convent. Members

are Sister Joan, Chief Kaiser, Mayor Bemmes, Nancy Stall and Bethany Dale.

• There will be a community roundtable meeting at 6:30 p.m., Thursday, March 31 at the plant. Community leaders and CAC members will be invited. The purpose is to explain the grant program and its timetable. Attendees will also brainstorm community needs in Reading. The Needs Assessment Surveys will be handed out at the end of the meeting. Attendees will be given a stamped, addressed envelope to return completed surveys by April 7. (The invitation list was passed around the table at the CAC meeting for comments or additions. Draft invitation letters and needs assessment surveys were also passed around. These documents were finalized, as there were no comments.)

• The CPI subcommittee is looking for volunteers to help stuff invitation letters on the evening of March 7 at Nancy Stall's house. If you are interested, see Bethany. We are also hoping that

several CAC members will attend and help staff the community roundtable meeting.

Emergency Response Community Education Planning

Bethany began the discussion by reminding CAC members that this topic was a direct request made at last month's meeting when we were setting the 2005 agenda. The goal is to develop a plan for disseminating information to the community about Rohm and Haas and the CAC, and how both have a role in emergency response.

• Chief Kaiser explained what the CAC and the Reading Fire Department have done so far on this topic with regard to Shelter In Place education. (Shelter In Place is a safety procedure designed to help protect you and your family during a serious airborne hazardous material emergency.)

Sponsored a booth at the Reading Crossroads Celebration and Taste of Reading in 2002. Posters were made for the booth, and giveaways (pens, magnets, brochures) with Shelter In Place instructions were handed out. Weather radios were also given away

through a door prize drawing.

Shelter In Place plans were created and updated for the Reading schools in 2003. CAC members worked with the Reading Junior/Senior High School Environmental Club to



Community Partnership Initiative

Reading Needs Assessment Survey

This survey is designed to identify the areas of greatest need in our community. As a leader and someone who has knowledge of the community, your insights are invaluable. We have asked about 50 local leaders to respond to this survey. Therefore, we are counting on your candid and timely response.

Please answer as many questions as you can. If you have no opinion, it is OK to skip that question.

Please remember that your completed survey must be received by **Thursday, April 7**, **2005** to be incorporated into our evaluation.

1.	In five words or less, please describe the three most pressing needs in our community Please rank responses in priority order with A being the highest priority.
A.	
B.	
2.	Which of the needs that you have identified can be impacted most effectively through a \$30,000 grant from the Rohm and Haas Community Partnership Initiative? (In order of top 3 priorities only)
A.	
В.	
C.	

3.	3. What type of involvement would be most effective for each of the priority needs y have identified? For example, funding directed towards planning, research, start-project support or matching grant?		
A.			
В.			
C.			
4.	What organization or network of organizations are best positioned to address the priority need that you have identified and why?	top	
_			
 5.	Please list three people in the community whom you consider to be leaders in hel to address community needs.	ping	
	* *	ping	
	to address community needs.	ping	

Thank you for completing the survey. Please use the envelope provided and return your survey by April 7, 2005!



July 23, 2001

Dear Reading resident,

You asked for it, and you got it! Rohm and Haas is pleased to introduce two new good neighbor initiatives at our Reading facility: a plant update line and an odor complaint hotline.

The odor complaint hotline is accessible 24 hours a day, seven days a week. If you smell a noxious odor and believe it could be coming from our facility, please call this line at (513) 733-2135. A live person will answer the phone, record your complaint and initiate an investigation into the source of the odor. You will be asked to give your name, address, phone number, type of odor and time noticed. To help plant employees locate the source of the odor, it is important to call the odor complaint hotline as soon as possible after it is noticed. Plant representatives will contact you on the status of the investigation.

The plant update line is a "listen only" line also accessible 24 hours a day, seven days a week. The line, (513) 733-2250, provides a recorded message about the plant, in the case of any spills, fires, injuries, unusual odors or loud noises. The purpose of this line is to provide information to the community as soon as possible in the event of an emergency situation. For safety reasons, please do not call any other plant number during an actual emergency because it could tie up telephone lines needed for response activities.

These neighbor initiatives are a direct result of Rohm and Haas' Community Advisory Council (CAC), which was established in January 2001. The CAC is a group of Reading community leaders, neighbors and plant representatives who meet monthly to discuss plant environmental, health and safety issues.

For your convenience and easy access, we have placed the plant update line and odor complaint line numbers on the enclosed refrigerator magnet. If you would like additional magnets or have any questions, please contact Ms. Linda Stichtenoth, our community relations representative, at (513) 733-2213.

Sincerely,

Bruce Beiser Plant Manager



** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. – 7:30 p.m.

Thursday, February 24, 2005

Rohm & Haas Plant Second Floor Conference Room 2000 West Street (Dinner will be provided)

Topic:
Emergency Response Community Education Planning

Please let me know by Tuesday, February 22, whether you will be attending the meeting. Guests are welcome.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany.dale@etc-online.com



AGENDA January 27, 2005 6:00 p.m.

Sign-In and Dinner
Welcome and Introductions
Plant Update
Announcements/Celebrations
Review of CAC Evaluation
Community Partnership Initiative
2005 Agenda Setting

Members and Guests Members and Guests Bruce Beiser Members and Guests Bethany Dale Bruce Beiser Bethany Dale



January 27, 2005 Meeting Minutes

Members Present

Bruce Beiser
Rachael Belz
Bud Elmlinger
Bill Ford
Chief Kevin Kaiser
Sister Krimm
Curt Lambert
Jim Pfennig
Nancy Stall
Tami Todd

Visitors/Guests Present
Tom Roesch, Reading Resident
Sandy Schoenberger, Rohm and Haas

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and members had dinner. Bethany reviewed the agenda and asked the CAC members and visitors to introduce themselves.

January Plant Update (Bruce Beiser) Safety

- No OSHA recordable injuries this month. Only had one in 2004.
- One employee had a first aid injury when he strained his shoulder.
- Bruce commented the plant is very proud of its safety record this year. He showed a chart demonstrating the decrease in the number of injuries over the past 3 years.
- Q: What is the major factor in the reduced number of injuries?
- A: Training and management's commitment to safety. We continuously emphasize safe working behaviors.

Environmental

Sewer

- No permit exceedances or deviations.
- The plant's south sewer is now a storm water only sewer.
- Plant received its new three-year permit from the Metropolitan Sewer District, effective January 1.
- MSD admitted they made a calculation error in plant's surcharge rate, overstated surcharge by 60%.

Air

• No permit exceedances or reportable releases.

RCRA (Resource Conservation and Recovery Act) Site Investigation

• The U.S. EPA has conditionally approved the plant's Revised Facility Investigation report with a request for additional work. A baseline risk assessment analysis of the site will be conducted.

Odor Complaints

• Plant received four odor complaints since December 2.

Three were on January 15 over a 12-hour period. All were reported as "rotten egg." Plant changed out scrubber solution after each report as a precaution. These odors are still under investigation. It was snowing that day, which could have kept the odors from dissipating in the atmosphere.

The fourth odor complaint was received on January 20 at 9:45pm. This was reported as "mercaptan." A production supervisor walked the perimeter of

plant to check.

Production supervisors will now walk down Bernard Ave. when odor complaints are received.

Early Truck Arrivals

- Since the last meeting (8 weeks ago) there were 12 early trucks. Some of the causes were weather related. Drivers were trying to make up time due to snow and travel conditions.
 - Five of the early arrivals were due to a new sourcing of import material. Plant is working with that company to correct the situation.

One truck was at the completely wrong address.

- One early delivery was caused by the driver's inability to read his work order. He delivered his shipment at 2:30am instead of the requested 2:30pm.
- One shipment was ordered by another Rohm and Haas location that didn't communicate the Cincinnati plant's delivery policy.
- Q: Where do the trucks go when you turn them away from the plant in the early hours? A: Sometimes they park in the Vonderhaar's parking lot. Other times, they park in the Field House lot. If that happens, the plant guard is supposed to call the police. The police respond and deal with the issue.

Methyl Chloride (MeCl) Emissions Reduction

• The Building 11 dryer was installed in December.

• The gas chillers are now functional and available on a 24-hour basis.

• Preliminary 2004 emissions total for methyl chloride is 16 tons. Half of that was from the first 2 months of the year before the plant had all the changes in place. Plant emissions in 2002 were 42 tons and 38 tons in 2003. (Post Meeting Minute: actual 2002 and 2003 methyl chloride emissions were 46.5 tons and 38.3 tons, respectively.)

The current system is operating with 99% efficiency. The emission goal for 2005 is 5

tons.

Community Relations

• Plant sponsored 53 children at the Lockland Head Start Program during Christmas.

• Site committed \$1,000 to Camp Invention for Reading schools.

• Site is sponsoring the 5th Annual Black History Month essay contest.

Members Announcements/Celebrations

• Chief Kaiser mentioned the Reading Relay For Life kick-off rally will be held Monday, January 31. (Flyers were available at the CAC meeting.) Bruce commented that the CAC can sponsor a team again this year if the group is interested.

• Rachael Belz showed the CAC a watercolor print "Good Neighbors Award" from the Ohio Citizen Action awards ceremony, which was held on Tuesday, December 7. Bethany handed out a photo collage from the event. Rachael said more photos are available on the OCA website: www.ohiocitizen.com.

Review of 2004 CAC Evaluation (Bethany Dale)

• Please see meeting handouts for full information.

Bethany thanked everyone who completed an evaluation. This year ,77% of members returned their survey, which was the highest participation rate ever. Bethany handed out a two-page summary of evaluation results. Overall, the CAC is working very well together with measurable satisfaction and progress made over the past 3 years.

Bethany also handed out a chart outlining the CAC's progress (based on evaluation results) on each of its major issues or areas of concentration. This included: plant odor reduction, reduction of methyl chloride emissions, early arrival of trucks, truck traffic on Bernard Ave., emergency response notification, neighbor and plant dialog, and community relations. (Note: truck traffic on Bernard was not measured in 2004 because this is not controllable by the plant.) In all categories except one the plant has made significant progress. The issues with the highest increase in progress/satisfaction over the past 3 years were methyl chloride emissions reduction and odor reduction. CAC members should be quite proud of this. This demonstrates that the time spent at meetings has been worthwhile and is making a difference for all Reading residents. The community relations progress ranking fell slightly below the 2003 score.

Two areas identified for continued improvement are: 1) increase the size of the CAC by adding more Reading residents and 2) add more focus to emergency response notification.

Q: Should the size of a facility correlate to the size of a CAC?

A: Not necessarily. We have about 16 active members which is typical for a plant this size. The ability of a group to accomplish tasks is more important that just the number of members.

CAC members had a discussion about emergency response and how to increase the focus on this issue. It was suggested that the CAC address this from a community standpoint instead of just one company. Suggestions for this issue included:

Assess what the community's emergency response concerns are.

Rohm and Haas should send out new magnets with the plant update line and odor complaint phone numbers. These were distributed to nearby residents in 2000 or 2001, but people move and they get thrown away.

Have a booth about emergency response at Reading's Business Fair on October 30-31.

Try to get encourage other Reading businesses to get involved in emergency response education. (i.e., Rosemont, Sealtron, and Patheon.)

Think about trying to form a Community Awareness Emergency Response (CAER). Other companies were reluctant to do this with Rohm and Haas a few years ago when the Ohio Citizen Action campaign against the plant was underway.

Community Partnership Initiative (Bruce Beiser and Bethany Dale)

• Please see the attached PowerPoint presentation for full overview of the program.

Background

Bruce unveiled the Rohm and Haas Community Partnership Initiative (CPI) program, which is a grant program funded by the Rohm and Haas Foundation. Essentially, it gives company CAC's the opportunity to award a \$30,000 grant to a non-profit community organization. The Reading plant was invited into the program this year because of its accomplishments and the positive working relationship it has built with neighbors. The intent is not to take the focus off the other

issues the CAC has been working on, but instead is an opportunity to make a new impact in the community. It will also help spread the word of the CAC and what we are all about.

Bruce read a few examples of winning grants from other Rohm and Haas sites. Bethany reviewed the timeline of the 2005 grant process, as suggested by Rohm and Haas' corporate office. Corporate has tools that we can use for every step of the process. Our CAC will have to follow the process, but we will have the flexibility to the run the program to meet our needs.

Decision To Move Forward

The CAC decided they want to participate in the CPI program. Bethany asked for volunteers to serve on a subcommittee to run this program. She will contact members who weren't at tonight's meeting to bring them up to speed. The first subcommittee meeting will be held before the next CAC meeting on February 24.

Q: Can the CAC participate in the CPI program indefinitely?

A: As long as the plant has an active CAC that is accomplishing something we should be able to participate.

Q: Will the first grant be awarded this year?

- A: Yes. We will go through the whole process this year and award the winning grant by November or December 2005.
- Q: Other organizations in town have conducted needs assessments in Reading that we may be able to build on. Could we get these individuals together and have a focus group to gather information instead of a mailed or telephone survey?
- A: It depends on how long ago the research was conducted. The CPI program requires that a needs assessment be done on an annual basis. But using a focus group is an idea the subcommittee can talk about.

Rohm and Haas has a model needs assessment tool so that people don't just pick a pet project. We don't necessarily have to follow the written survey format.

It's important to ask the right questions. You have to be careful the questions aren't leading.

- Q: Is the grant limited to a certain number of organizations?
- A: The preference is to award the \$30,000 grant to a single organization where the money can make a big impact.
- Q: Can a civic organization apply for the grant and use it to run 5 or 6 projects as long as they meet the requirements?
- A: First, the programs benefiting from the grant must all be explained in the grant application. If one organization has several programs that can help meet the identified community need, then they can divide the money. But everything has to be monitored and reported.
- Q: If we grant money to an organization and we find out the money was not used properly, what course of action do we have? Is the money divided throughout the year?
- A: The money is disbursed at one time. That's why we need to choose the winner carefully. The grant application is very specific. Most organizations applying for a grant like this will have experience professionally managing the money. As a reminder, we will get interim and final reports from the grantee. It is our job to make sure they are on track.
- Q: How many people should be on the subcommittee?
- A: 5-7 people.

Geographic Focus of Grant
The CAC voted to limit the geographic focus of the grant to Reading at this time. That is not to say that an organization outside of Reading can't apply for the grant as long as the end user (or final impact) of the grant is meeting the needs in Reading.

2005 Agenda Setting The CAC decided a 2005 Agenda for the remaining meetings of the year. Please see attached.

The meeting adjourned at 7:50 p.m.

Rohm and Haas

Community Partnership Initiative (CPI) January 27, 2005

Community Partnership Initiative (CPI) Overview

- Launched in 1998 in four Rohm and Haas communities
- B. Expected to expand to nine communities in 2005
- c. Contributed \$1.2 million in grants since 1998 to three primary areas: youth, after school programs and land use.
- b. Led by each local CAC
- E. Provides opportunity for Rohm and Haas and CAC to work together to make a difference in each Rohm and Haas community.

CAC Role

CAC leads the CPI program and is responsible for:

- Conducting a needs assessment survey of local community leaders.
- Establishing a focus for CPI based on assessment results
- Evaluating proposals and awarding an annual grant of \$30 000
- Monitoring results and take action as necessary to ensure the goals of each grant are accomplished

First Steps

- Determine appropriateness of launching local CPI.
 - How does it fit with the mission of the CAC?
- · What impact will it have on the operation of the CAC?
- What value does it have for the community?
- Should the CAC move forward with CPI?
- Establish geographic focus
- What communities are directly connected to Reading?
- Who are our closest neighbors?
- What mile radius makes most sense
- Form CPI Subcommittee to organize needs assessment.

Community Needs Assessment

- Objective: Survey community leaders to identify most local critical need
- Steps required:
 - Determine geographic focus
 - Finalize survey/interview questions
 - 3 most pressing needs in target geography
 - Organizations best positioned to address them
 - Names of other community leaders
 - Respondent demographic information
 - Reach broad cross section of community leaders
 - Analyze results and determine local CPI focus

Grant Selection Process

- Objective: Select the proposal best positioned to impact local focus.
- Steps required:
 - Define focus, priorities and other criteria for grant evaluation
 - Develop and send Request for Proposals
 - Evaluate proposals and select 1-3 leading candidates
 - Select winning proposal after in-person presentations by top candidates

Post Grant Management

- Objective: Ensure grant achieves its goals
- Steps required:
 - Meet with Grantee to finalize on Performance
 - Review Interim and final reports
 - Take action as needed to keep grant on track

2005 Timetable

January

■ CAC evaluates CPI concept If approved:

Establishes geographic focus

Forms CPI Subcommittee to manage basic program activities

February

CPI Subcommittee meets to finalize needs assessment survey and mailing list

Survey sent

April

Deadline for survey responses: April 22nd

2005 Timetable

May

- * CAC meets to:
 - Evaluate survey results
 - Determine CPI focus, priorities and selection criteria
 - Finalize Request for Proposal form and mailing list
- Request for Proposal is sent

August

Deadline for proposals: August 15th

2005 Timetable

Sept/Oct

- CPI Subcommittee reviews proposals and selects top 1-3 candidates
- Full CAC reviews Subcommittee report of all proposals received and hears presentations from top 1-3 candidates
- CAC selects 2005 grantee or issues 2nd RFP

2005 Timetable

Nov/Dec

- 2nd round RFP completed and 2005 grantee selected [if necessary]
- CPI Subcommittee meets with Grantee to establish Performance Plan



Cincinnati Facility Community Advisory Council 2004 Evaluation Summary

Background

- The CAC has 22 members, 16 attend on a regular basis
- 22 surveys were mailed out in early December
- 17 surveys were returned (77% participation)

Survey Results

Aspects of CAC That Are Working Well

90-100% of members felt that:

- CAC is working together to address EHS concerns of the plant and the community (100%)
- CAC's mission statement is appropriate (100%)
- their time on the CAC has been well spent (94%)
- they believe their concerns or questions are being addressed (94%)

82-88% of members felt that:

- CAC is developing ideas to improve and support local programs and activities in the City of Reading (88%)
- they would like to remain on the CAC in 2005 (82%)
- they are comfortable asking questions or raising concerns at meetings (88%)

About 65% of members felt that:

• the CAC has the <u>right mix</u> of members (65% said yes, 24% said no, 12% not sure)

Aspects of the CAC That Members Are Close to a Split On

• whether the CAC has enough members (59% said yes, 18% said no, 24% not sure)

CAC Scorecard of Meeting Structure and Schedule

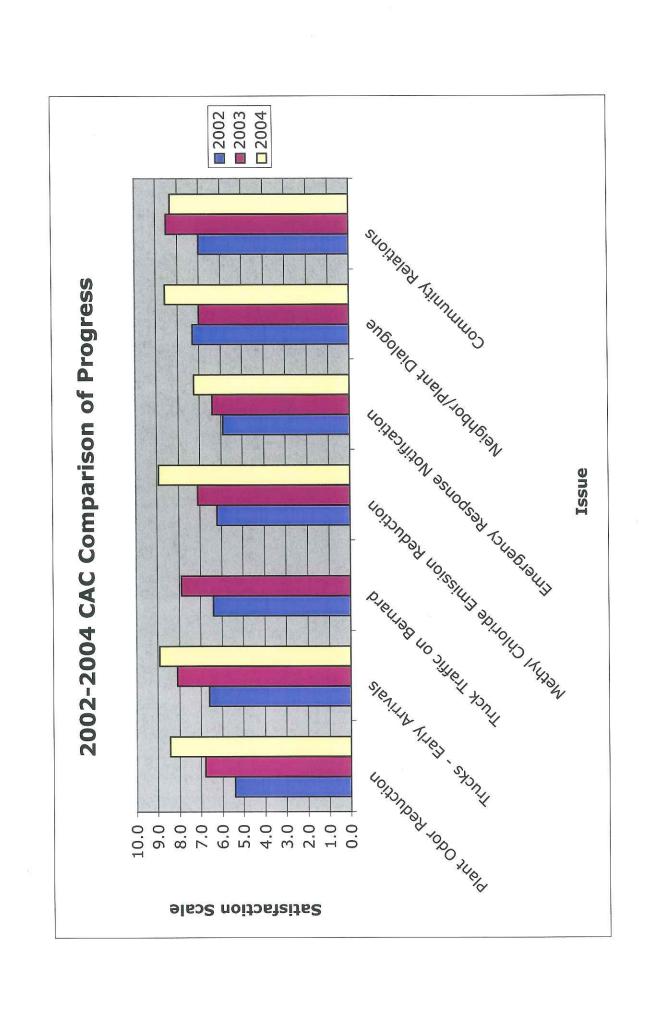
		Average Score (0=totally dissatisfied and 10=totally satisfied)
•	Meeting Date	9.3
	Meeting Location (plant)	9.2
•	Food and Beverages	9.2
6	Meeting Minutes	9.1
	Facilitator	9.1
•	Meeting Time	9.1
•	Meeting Duration	9.0
•	Meeting Style	9.0
٠	Meeting Frequency	8.9
•	Resolution of Disputes	8.6

CAC Dedicta, ii or i rogress	CA	C	Scorecard	of	Progress
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CAC Scorecard of Progress	
<u>Issue</u> <u>Aver</u>	age Score (0=no progress and 10=excellent progress)
 Methyl chloride emission reduction 	8.9
• Tucks — early arrivals	8.9
Neighbor/plant dialogue	8.6
Plant odor reduction	8.4
 Community relations 	8.3
• Emergency response notification	7.3
Voted More Helpful or Valuable Meeting Topi	cs in 2004
General topics addressed at each meeting	# of Votes
Announcements of plant releases to air, land, wat	ter, sewer 13
Update on methyl chloride emission reduction p	
Updates on odor reduction projects	13
Community relations updates	7
Number of early trucks outside plant gate	7
Safety updates (lost-time and recordable injuries)	
Featured topics	
Plant's odor reduction project	11
Methyl chloride emissions reduction project	10
Plant's 2003 Toxic Release Inventory data	9
Status of Plant's RCRA Site Investigation	8
Plant tour and security changes	8
	7
Emergency Response Notification	
MSD presentations	6
Mill Creek History on B&B Riverboat	5
Topics CAC Wishes to Address in 2005	
General topics addressed at each meeting	# of Votes
Announcements of plant releases to air, land, wa	
Methyl chloride emissions reduction project upd	
Odor reduction projects update	12
Community relations update	12
Safety updates (lost-time and recordable injuries	
Trucks parking outside plant gate	8
Featured topics	
Plant's odor reduction project	13
Methyl chloride emissions reduction project	11
Plant's 2004 Toxic Release Inventory data	10
Results of RCRA site investigation	10
Plant tour	9
Ohio River B&B Riverboat trip	9
MSD - SSO 700 Update	9
Er gency response notification	8
.	

Bottom Line: Areas For Improvement In 2005

- Continue to work on CAC membership by adding more members.
- Continue to work on emergency response notification.





2005 Meeting Agenda

February 24 Emergency Response/Community Education Plans

March 24 Odor Reduction Plan – New Tasks

April 28 Plant's Environmental, Health, and Safety Management System

May 26 Community Partnership Initiative – Review Needs Assessment Results

June 23 2004 Toxic Release Inventory Data

July NO MEETING

August 25 Update on Plant's RCRA Site Investigation – Results of Risk Assessment

September 22 B&B Riverboat Trip/Review CPI Subcommittee Report on Grant Proposals

October 27 Community Partnership Initiative – Grant Proposal Presentations

November NO MEETING

December 1 To Be Determined

Palley Courier

The Valley Sports Journal

Covering the Heart of Hamilton County

Volume 22 No. 40

Wednesday, December 22, 2004

Price - 50¢

Page 20

Valley Courier / Valley Sports Journal

December 22, 2004

Environmental Group Recognizes Rohm & Haas

Rohm and Haas' Cincinnati plant and six Reading neighbors who are currently or formerly live near Rohm and Haas' facility were recognized with "Good Neighbors" awards on Tuesday, December 7 by Ohio Citizen Action, a statewide environmental group.

The Rohm and Haas company and a group of local neighbors and environmental organizations have worked together since May of 2001 to reduce pollution emitted from the plant. In addition to the large pollution reductions, the company-community partner-

ship worked to resolve three other community issues: reduced odors from the plant, stopped delivery trucks from parking or idling overnight outside the fenceline, and worked with community members to improve emergency response issues in the neighborhood and the Reading community.

"We were very pleased to present the Good Neighbors awards jointly to Rohm and Haas' Cincinnati plant and the dedicated neighbors who worked so hard to resolve these long standing issues," Rachael Belz, Ohio Citizen Action Associate Director stated. "This is the first time we've recognized a company and community jointly for this type of award. It really shows what a company can do when working directly with neighbors in the area."

The awards were given in recognition of the hard work of the neighbors and the plant management to reduce pollution and improve community relations with the company.

As result of the effort, Rohm and Haas: made significant improvements to reduce methyl chloride pollution emitted from the plant, the company will be releasing less than 10 tons of methyl chloride as of 2005; made large investments and improvements to significantly eliminate odors; continue to work with trucks making deliveries to not park or idle overnight; and are addressing emergency response issues through the Advisory Council.

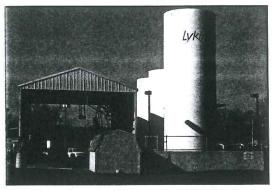
The Rohm and Haas site was formerly owned and operated by Morton International and is located at 2000 West Street in Reading. Three other communities or individuals from Cincinnati and Dayton

were also recognized at the awards ceremony for community work in Southwest Ohio.

The company-community partnership updates progress of the projects and tackles any new issues through the Community Advisory Council. The group meets on the fourth Thursday of the month throughout the year and is open to new members. The next meeting will be held Thursday, January 27 from 6:00 to 7:30 pm at the Rohm and Haas plant conference room. For more information, please contact Bethany Dale at 772-7903.

Cooking Oil As Fuel

By Lilkeisha Smith, Public Affairs Intern & Ken Edgell, Environmental Administrative Coordinator



Cooking oil as fuel? It's not as far-fetched as you might think. On October 29th, 2004, six tri-state gas stations began selling blended biodiesel fuel at their pumps.

Biodiesel fuel is made from used cooking oil collected from local restaurants or from soybean oil. The cooking oil is referred to as "yellow grease" while the soybean oil is called "white grease." Both oils can be processed into biodiesel fuel. In this area, Griffin Industries is one company that produces the blended fuel and Lykins Oil Company distributes it.

Griffin Industries, in Alexandria, KY, uses yellow grease to produce biodiesel fuel. Because biodiesel fuel costs more than regular diesel, the two fuels are blended. Mixtures of two percent Biodiesel (B2), five percent (B5), or 20 percent (B20) are currently available.

Lykins Oil Company in Clermont County has begun distributing B2 fuel to tri-state service stations as a starting point. While biodiesel fuel is more expensive than regular diesel fuel, mainly because there are few companies that produce it and the supply is limited, customers should not see any ad nal cost. For the moment, Lykins is absorbing the additional cost until drivers

become accustomed to the idea of biodiesel fuel. As the demand increases the price will decrease and the fuel will increase to the B20 level.

Biodiesel has several advantages over regular diesel. It burns cleaner so it creates less air pollution, it is non-toxic and biodegrades in the environment. This blended fuel also keeps the inside of the fuel system and injectors clean and free of deposits. Not only is biodiesel great for the environment, but there is also an economic advantage.

President Bush recently signed a bill containing a biodiesel tax incentive. The bill creates a federal excise tax credit amounting to a penny per percentage point of biodiesel fuel. The excise tax takes effect January 1st, 2005. The tax incentive will make the cost of blended biodiesel fuel competitive with regular diesel fuel.

HCDOES is currently fueling 74 Riggs Bus Company buses with B20 fuel for an entire school year as part of a demonstration project funded by an EPA grant. Two months into the grant, the bus drivers noticed a reduction in the amount of diesel emissions in the bus yard during early morning startups. They also noticed no difference in the performance and that the smell of the exhaust is not as pungent as before.

Biodiesel is good for the environment and good for the economy because it relies on renewable energy resources grown right here in the U.S. More importantly, it reduces our dependence on foreign oil. For more information on biodiesel fuel, visit www.biodiesel.org. For more information on the Riggs Bus Company program, visit www.hcdoes.org.

HAMILTON COUNTY ENVIRONMENTAL S E R V I C E S www.hcdoes.org

Mission: To protect, preserve and enhance the environmental quality of the community.

The Breeze is published by the Hamilton County Air Quality Management Division for Butler. Clermont. Hamilton and Warren counties.

More Inside

Permits & Enforcement: Pq. 2

■ Air Quality Calendar: Pg. 3

■ Air Quality Statistics: Pg. 5

■ Monitoring & Analysis: Pg. 5

New FREE Air Quality Notification Service Now Available

The Cincinnati area, including Butler, Clermont, Hamilton, and Warren counties, has been chosen from cities across the country to participate in the launch of EnviroFlash, a new air quality notification service.

EnviroFlash is a free service that provides you with information about air quality in the location of your choice via a daily email. It is produced through a partnership between EPA and state and local environmental agencies. In this initial pilot program, you can choose to receive notifications about air quality action days, as well as, air quality forecasts for the upcoming days. "Air quality action day" is a generic term for specific local air quality action programs such as "smog alerts." The program will become nationwide in 2005.

For more information and to subscribe to this service, visit www.hcdoes.org and click on the EnviroFlash link.

Acronym Guide

USEPA United States Environmental Protection Agency

Ohio EPA Ohio Environmental Protection Agency

HCDOES Hamilton County Department of Environmental Services

AQMD Air Quality Management

Division



** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. - 7:30 p.m.

Thursday, January 27, 2005

Rohm & Haas Plant Second Floor Conference Room 2000 West Street (Dinner will be provided)

Topic:
Review of CAC Evaluations
2005 Agenda Setting
New Community Project

Please let me know by Tuesday, January 25, whether you will be attending the meeting. Guests are welcome.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany.dale@etc-online.com



AGENDA December 2, 2004 6:00 p.m.

Sign-In and Dinner
Welcome and Introductions
Plant Update
Announcements/Celebrations
MSD Regulations and Local Projects
MSD Sanitary Sewer Overflow 700
Preparation of CAC Evaluation

Members and Guests Bruce Beiser

Chris Hall, MSD Marty Umberg, MSD Bethany Dale



December 2, 2004 **Meeting Minutes**

Members Present

Bruce Beiser Rachael Belz Mayor Bemmes Carol Bullock Carpenter Cheyenne Gill Chief Kevin Kaiser Sister Krimm Dave Lehrter Margie Lehrter Dan Milz Jim Pfennig Tami Todd Eric Walker

Visitors/Guests Present Chris Hall, MSD Marty Umberg, MSD Melanie Lennon, Rohm and Haas Keith Mesch, Rohm and Haas

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone, reviewed the agenda, and asked the CAC members and visitors to introduce themselves.

December Plant Update (Bruce Beiser)

Safety

- No OSHA recordable injuries for the last 3 months. Only had 1 year-to-date.
- No first aid injuries to plant employees.

Environmental

Sewer

- No permit exceedances or deviations.
- Sewer modifications are underway to reroute south sewer flow of sanitary and process wastewater to the west outfall.
- Fourth quarter west sewer results were all in compliance.

Air

No permit exceedances or reportable releases.

Odor Complaints

There were no odor complaints this month.

Early Truck Arrivals

The plant had one early truck since the last meeting (5 weeks ago), which arrived at 6:30 a.m.

Methyl Chloride (MeCl) Emissions Reduction

Building12 dryer was installed.

• Building 11 dryer scheduled for installation next week.

• The inert gas chillers are now functional on both compressor trains and will be in 24-hour operation by the beginning of next year.

Current run rate emission projections:

- Run rate today: 10-12 tons per year

- At end of 2004: 5-6 tons per year

- End of first quarter 2005: 3.5-4.2 tons per year

Plant has achieved a 90% reduction.

Miscellaneous

• Plant name change from Morton International, Inc. as legal entity to Rohm and Haas Chemicals LLC. Permits will reflect the new name change.

 Tami Todd has officially been named Humans Resource Manager for Cincinnati and West Alexandria facilities. She had been working as a contract employee for the past year.

Community Announcements

Mayor Bemmes thanked Bruce for hosting the CAC meetings.

• Carol Bullock Carpenter let everyone know that there will be a J2K Christmas program from 4:00-5:30 pm on December 5 at St. John's Church in West Chester. 15 churches participate, 75 churches have been invited. There will be music, readings, and fellowship. Afterwards, there will be a tree lighting ceremony in Reading at 6:00 p.m., blessing of the crib at Fifth Third Bank, carriage rides, hot chocolate, and Girl Scout caroling. Local shops will be open late and luminaries will be lit around Reading.

• Rachael Belz reminded the CAC about the Ohio Citizen Action awards ceremony, which will be held 6:30 – 8:30 p.m. on Tuesday, December 7 at the Civic Garden Club in Cincinnati. Congratulations to the plant, the neighbors and all the CAC members for their years of hard

work!

Metropolitan Sewer District's Pretreatment Program (Chris Hall)

Please see attached slides as a summary of Chris's presentation.

Q: Which barrel company was part of MSD's covert surveillance?

A: The name was Barrel and Drum Service, but they are out of business now.

Q: How often does MSD sample Rohm and Haas?

A: We conduct quarterly sampling for surcharge on the plant's west sewer and semi-annual sampling on the south sewer. MSD uses a flow proportion composite sampling method.

Metropolitan Sewer District's Sanitary Sewer Overflow 700 Project (Marty Umberg) Please see attached slides as a summary of Marty's presentation about SSO 700 in Reading.

Background Information

- A Sanitary Sewer Overflow (SSO) is a discharge of untreated sanitary wastewater into the environment.
- A Combined Sewer Overflow (CSO) is a discharge of untreated storm and wastewater from a combined sewer into the environment.

• MSD stopped building combined sewers in the 1940-1950s.

• MSD entered into a Consent Decree with the U.S. EPA, Department of Justice and Ohio EPA in 2003 to address CSOs, SSOs, water in basements, and operational issues and procedures. The program is to be completed in 2022.

- SSO 700 is the largest sanitary sewer in MSD's system. (It is larger than all other sanitary sewers combined.) This is a sewer modification project to take the storm water load off the sewer system.
- Q: Will there be a lot of equipment in the area during the construction project?
- A: The plant has a construction easement which grant's MSD access to the road behind the plant's back gate so equipment can get to the SSO 700 site. This equipment will arrive before construction begins and will remain at the job site until it is no longer needed. There will not be daily traffic of big construction equipment.
- Q: If you just have sanitary waste in the storage chamber, do you release that into the sewer when the wet weather passes?
- A: Yes. Once the sewer can handle the stored water, it will be released to the Mill Creek treatment plant.
- Q: What is the storage capacity of the SSO 700 facility?
- A: 3.6 million gallons of water can be held in the storage facility.
- Q: Is that storage tank above or below ground?
- A: Aboveground.
- Q: Will SSO 700 ever overflow?
- A: It shouldn't. In the past, the overflows were caused by upstream loading. The new facility is designed to accept all upstream loading. The only way an overflow could happen once the facility is built, is if there is a backup south of the pipe.
- Q: When will the facility be built?
- A: The facility should be online by July 30, 2006.
- Q: Has a facility like this ever been built?
- A: This may be the first of its type to be built on a sanitary sewer overflow in the U.S. Others have been built at treatment plants.

Bruce noted that the plant is making sewer modifications to take some of the storm water load off the combined sewer system. The plant is also constructing a retention system to capture excess flow during rain events and then discharge that flow once the sewer is able to handle it again. The retention system plan has been favorably reviewed by Ohio EPA and MSD.

Closing

Bethany reminded members that it is time for the annual CAC evaluation. She asked members if they wanted to review and/or make changes to the evaluation instrument. The membership felt the evaluation was okay to send as is once it is updated to reflect this year's meeting topics. The surveys will be mailed to members late next week and results will be provided at the January meeting.

In closing, Bethany thanked the speakers from MSD for their informative presentations, and thanked everyone else for coming to tonight's meeting. She will be in touch before the January 27 meeting. Happy holidays!

The meeting adjourned at 7:40 p.m.

MSD's Pretreatment Program



Metropolitan Sewer District of Greater Cincinnati Division of Industrial Waste December 2, 2004 Cincinnati, Ohio

Metropolitan Sewer District of Greater Cincinnati

F. Christopher Hall, PE- Senior Engineer
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PACS 2000 System Administrator; Section Supervisor,
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Chief Troubleshooter

Pretreatment

- Pretreatment prevention or removal of pollutants from industrial sources discharging to the Publicly Owned Treatment Works - POTW that may interfere with wastewater treatment system operations or pass through into the environment.
- 🕏 Required by the Clean Water Act

Pretreatment tools

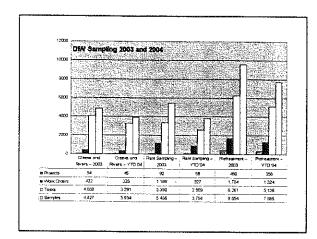
- MSD Rules and Regulations
 Article XV Industrial Waste
- Enforcement Response Plan
- Mastewater Discharge Permits
- Routine sampling for compliance and surcharge
- **E** Covert surveillance

Pretreatment database tools

- ₹ PACS 2000
 - Oracle based application that provides all the necessary modules to implement our pretreatment program
- ₹ CAGIS GEN7
 - Regional GIS utility application that provides a platform for mapping and data sharing between diverse government applications
- **₹. CAGIS DOCS**
 - E Document Imaging System

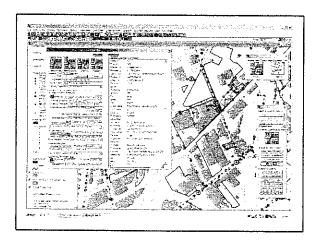
Industrial User Permitting

- 8. 68 permitted categorical users CIU
- 71 permitted significant users SIU
- 7 67 permitted Non-SIU
- 13 permitted groundwater remediation LTD
- 25 permitted Waste Haulers
- 7 45 Restaurants
- 4 147 Commercial operations



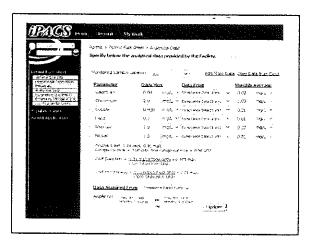
CAGIS PACS

- Integration of PACS 2000 into CAGIS GEN7
- Development of GEN7 tools for PACS users
- · Distribution of PACS data to GEN7 users
- Deployment of 'field-based' application allowing field generation of PACS work



i-PACS

- Redevelopment of PACS using a web based environment
- MSD and Phoenix charter members with EnfoTech on this development project
- Allows customer interaction with the database; completing forms, submitting reports, requesting information
- Provides for MSD work flow and pretreatment streamlining



CAGIS DOCS

- Upgrade of DIW DOCS OPEN to MSD standard for document imaging
- Provides more Doc Types and faster and more effective searches
- Images more types of documents goes beyond just industrial records to capture laboratory, building, and financial documents

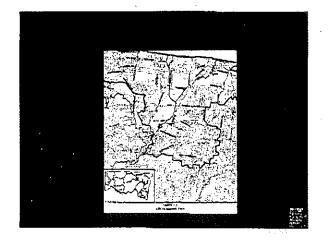
Metropolitan Sewer District
of Greater Cincinnati

SSO 700

CAC - Rohm & Haas
December 2, 2004

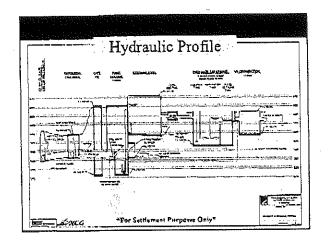
Presentation Outline

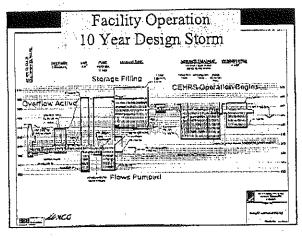
- SSO 700 Background Information
- Alternatives Considered
- Proposed Facility

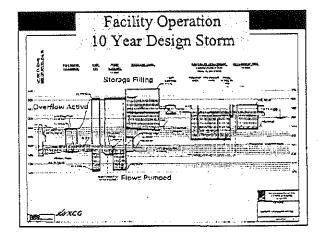


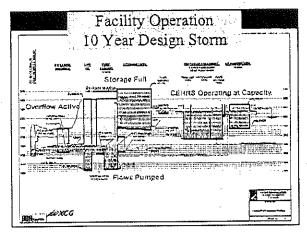
Issues Considered

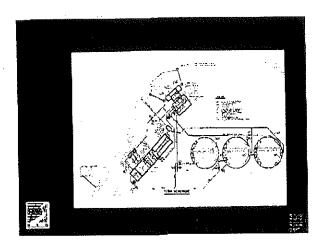
- Consent Decree Negotiations with Regulators
- Alternative Solutions
- Mill Creek Deep Tunnel Study
- Water Quality Mill Creek
- Emerging and Evolving National SSO Policy











CEHRS and Storage Facility Effectiveness Study

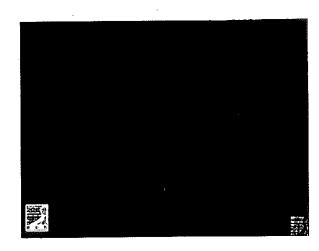
-within 30 months of entry of Consent Decree.
- Work Plan for 2 year Study of Facility
- Schedule for Study and Report
- Study begins after completion of construction
- Performance evaluation



BENEFITS OF PROPOSED FACILITY

- Provide water quality benefits in shortest time frame.
- Opportunity for MSD/EPA to conduct national CEHRS technology demonstration.
- Provides SSO control during evaluation of Mill Creek Tunnel.
- Allows for USEPA SSO policy development and finalization







** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. – 7:30 p.m.

Thursday, December 2, 2004

Rohm & Haas Plant Second Floor Conference Room 2000 West Street (Dinner will be provided)

Topic:

Speakers from the Metropolitan Sewer District will be discussing local sewer projects and how they regulate industries like Rohm and Haas.

Please let me know by Tuesday, November 30, whether you will be attending the meeting. Guests are welcome.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany.dale@etc-online.com



AGENDA October 28, 2004 6:00 p.m. — 7:30 p.m.

Sign-In and Introductions

Dinner

Plant Update

Bruce Beiser

Announcements

Methyl Chloride Emissions Reduction Project Update

Mike Rouse

NOTE: Next CAC meeting is December 2



October 28, 2004 Meeting Minutes

Members Present

Karen Arnett
Suzie Bateman
Bruce Besier
Rachael Belz
Bill Ford
Cheyenne Gill
Chief Kevin Kaiser
Dave Lehrter
Margie Lehrter
Jim Pfennig
Barb Stall
Margie Stall
Tami Todd

Visitors/Guests Present
Ruth Breech, Ohio Citizen Action
Mike Rouse, Rohm and Haas

Facilitator Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone, reviewed the agenda, and asked the CAC members and visitors to introduce themselves.

September & October Plant Update (Bruce Beiser) Safety

No OSHA recordable injuries for the last 2 months.

- No first aid injuries to plant employees. There was one contractor injury requiring stitches.
- The plant is going to receive a safety award from the American Chemistry Council for no lost time injuries in 2003.

Environmental

Sewer

No permit exceedances or deviations.

• Plant had a process upset, which caused a momentary pH drop in the west sewer outfall. Quick action by the supervisor shut off the flow until corrected.

• Sewer modifications are underway to reroute south sewer flow of sanitary and process wastewater to the west outfall. Using 'directional boring' for 16" and 12" sewer lines instead of trenching. This allows loading docks and roads to remain open during the construction. Weather permitting, this should be complete before year end.

Air

• No permit exceedances or reportable releases to report.

Odor Complaints

• Curt Lambert received a neighborhood odor complaint on 9/27/04. Curt told Bruce that he doesn't always log complaints in when they are called in to him directly. He will

start logging all complaints called in to him.

Margie and Dave Lehrter added that Mr. Koetter has called them when he detects an
odor at his house. Dave Lehrter noted fishy odors lately rather than mercaptan, but said
he doesn't always call them in. Bruce asked that everyone keep him up to date
regarding odors.

- Q: Have you (Dave and Margie) taken an air sample with the canister when you detect an odor?
- A: Not yet.

Odor Reduction Project

• The ventilation project continues in operation.

• In 2005, the plant will be working on a project to modify the process that uses the odiferous material. The goal will be to reduce the amount of material in the wastewater because that wastewater carries the odor. A process chemist will be reviewing technologies to make that process more efficient.

Early Truck Arrivals

• The plant had one early truck, which arrived at 6:30 a.m. It was let in the gate at that time.

Methyl Chloride (MeCl) Emissions Reduction

• Mike Rouse, Process and Project Engineering Manager, will present the status of the project tonight.

• Since March 1, MeCl emissions have been 5.8 tons (96-99% efficiency). Prior to the system improvements, the plant used to emit 40 tons/year. The plant's goal is to get below 10 tons in early 2005.

The first set of gas dryers are scheduled for installation in mid-November. The second

set will be installed in December.

• The plant is testing the use of methyl chloride to cool the vent stream. This has shown an efficiency of 50%. The cooling system is being set up on the second compressor train and should increase overall recovery by 1%.

Emergency Response

• On October 7, the plant had a fire in the roof of Bldg. 11/12 near the tin melt room. The fire was the result of contractor work (welding) in modifying the roof. It was mostly smoke as the burning material was trapped between layers. Five fire departments responded. The loss was estimated at \$10,000. Bruce Beiser was interviewed by Channel 9 news and The Enquirer. No evacuation of plant employees was necessary. Eric Walker updated the neighborhood message line in case neighbors called inquiring about the incident.

Directional Boring

• Part of the directional boring process uses water and bentonite clay. This dirt is non-hazardous so we have decided to build an earth berm in the field. We will then discharge the water slurry into the berm and let that water dissipate down into the ground. That leaves the clay and dirt and we will use that to construct earthen berms for storm water runoff next year. This work will done within the plant's fence line on the west side of plant. This is nothing to be concerned about. There will be one more week of boring.

• The plant's storm water management plan has been accepted by the Metropolitan Sewer District and Ohio EPA. Plant will install a 500,000-gallon storage tank to divert discharge during rain events. The design is being engineered now.

Community Announcements

- Cheyenne Gill announced that she is expecting a baby in January. She will be on maternity for a few months and will return before the end of the school year. Congratulations to Cheyenne!
- Rachael Belz announced that Rohm and Haas and the CAC's fenceline neighbors will be receiving the first-ever corporate 'Good Neighbor Award' from Ohio Citizen Action. Ohio Citizen Action recognizes that the CAC is still working on neighborhood issues but truly wants to recognize the group for all their hard work. The award ceremony will be held 6:30 8:30 p.m. on Tuesday, December 7 at the Civic Garden Club in Cincinnati. Rachael passed out the award announcement and a Save the Date card to all members present at the meeting. All CAC members will receive a formal invitation in the mail. Congratulations to the plant, the neighbors and all the CAC members for their years of hard work and voluntary attendance at the meetings!

• Bruce Beiser added to the cheer by announcing that tin metal prices have stabilized, consequently the plant has become more economically viable in terms of competitiveness. The plant is projecting a volume increase of 8%. Some of the retailers are going to accept price increases.

Methyl Chloride Emission Reduction Project Presentation (Mike Rouse)

Please see attached slides as a summary of Mike's presentation.

- Q: Before new gas flow meters were installed, were your estimated emissions based on the amount of raw material used?
- A: We calculated the emissions by looking at the quantity of methyl chloride put into the system and subtracting the amount that is captured. The TRI reports are figured based on a material balance.
- Q: So, are the MECl emissions more accurate now?
- A: Yes, we now know the exact quantity coming out of the point source vent.
- Q: You mentioned that you've spent \$500,000 \$600,00 on this project. Are you figuring in the amount of your used MeCl that you are able to sell to other companies?
- A: We sell the recovered MeCl for about half the price of what we pay for new material. The plant will receive about \$10,000 \$15,000 more per year from the additional MeCl recovery.
- Q: Can Rohm and Haas reintroduce its recovered MeCl as a raw material?
- A: No. Recycling concentrates impurities to the point of hindering our process, but other processors can use it.
- Q: Who buys your recovered MeCl?
- A: A company in Wisconsin uses it as a raw material. I'm not really sure what they make with it.
- Q: There are new rules by Ohio EPA that allow for exemptions, will the plant file for an exemption?
- A: The plant intends to become a synthetic minor source in order to be exempt from the Maximum Achievable Control Technology (MACT) Standards. Currently, the plant has its methyl chloride emissions above 10 tons per year. This makes the plant subject to the MACT standards. We should be able to get to our MeCl emission recovery system operating at less than 10 tons per year sometime next year, which will be before the MACT Standards go into effect in November 2006.

What is the life span of the new compressor seals?

Q: A: The new ones will wear out. They are considered a standard wear part. We'll have to change them every 6 months-1 year.

Bethany thanked everyone for coming to tonight's meeting and reminded the CAC that the next meeting is December 2. A speaker from the Metropolitan Sewer District will be discussing sewer projects and how they regulate industries like Rohm and Haas. Tami Todd reminded members to set their clocks back one hour this Saturday.

The meeting adjourned at 7:40 p.m.

Methyl Chloride Emissions Reduction Project

AGENDA

- 1. Historical Air Emissions of Methyl Chloride
- 2. Completed Work
- 3. Overall System
- 4. Compressor Upgrades
- 5. Additional Work to be Done, Conclusions, Questions

Historical Air Emissions

Historical Methyl Chloride Air Emissions (tons per yes
[numbers in brackets are projected emissions]

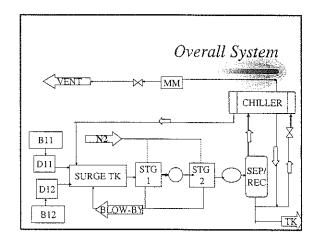
YEAR	Q1	Q2	Q3	Q4	Total
2001					~35
2002					~46.5
2003	9.4	11.7	6.0	11.2	~38.3
2004	9.1	2.7	2.6	[~2.5]	[~16.9]
2005	[~2.5]	[~2.5]	[-2.5]	[~2.5]	[-10.0]
2006	[-2]	[-2]	[~2]	[-2]	[~8]

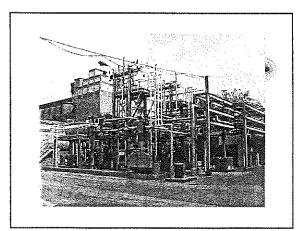
Roughly corresponds to an increase in recovery efficiency from 86% to 98%.

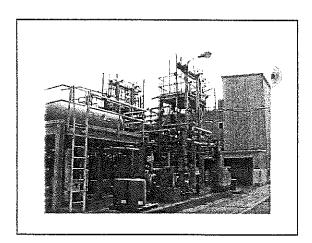
Completed Work

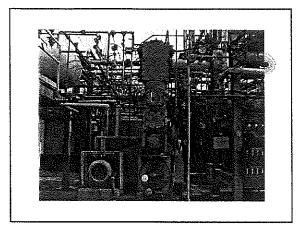
2. Completed Work

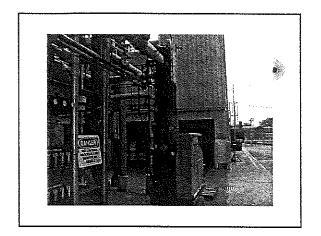
- A. Seal Upgrades in Compressors new sealing system recycles blowby back to suction. Raised recovery about 8-10%.
- Process Optimization conditions, fewer start-ups/shutdowns, less Nitrogen.
- C. Added new gas flow meters more accurate, more data.
- Replaced vent pressure controls new electronic instruments are quicker and more precise. Raised recovery further about 2-3%.
- Dryer Replacements (4Q install) MeCl gas is water scrubbed then dried. Moisture leads to compressor and seal failures.
- Dew Point Analyzers new technology can measure moisture and verify drier operation.

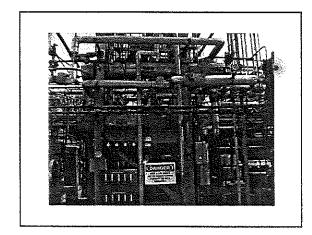


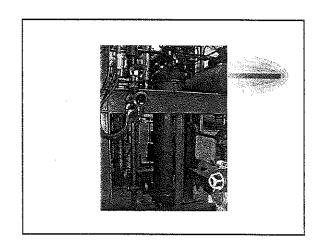


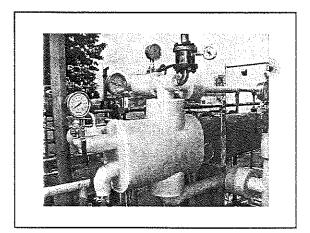


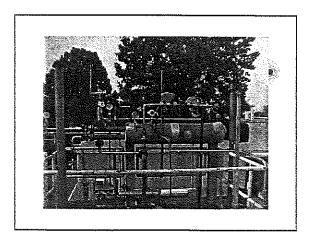


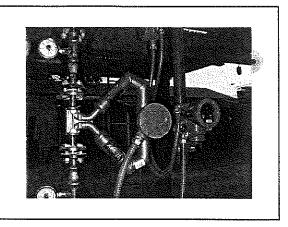


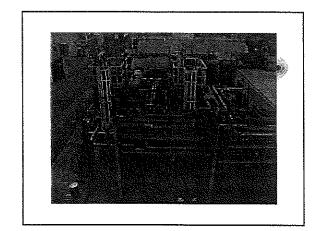










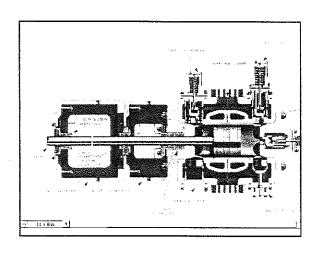


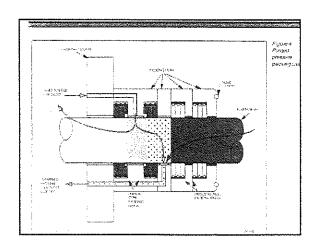
Compressor Upgrades

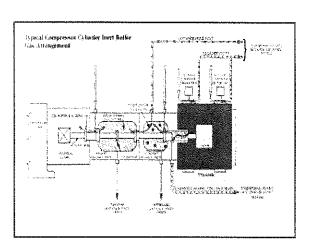
Dresser Rand reciprocating compressors.

Dresser Rand developed fugitive emissions control technology in response to California air regulations and later developed retro-fit kits for older compressors.

Upgrade kits also greatly improve compressor reliability.



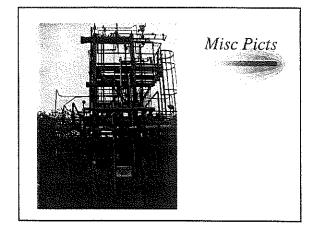


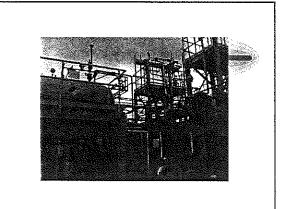


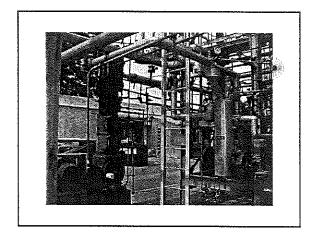
Additional Work to be Done, Conclusions, Questions

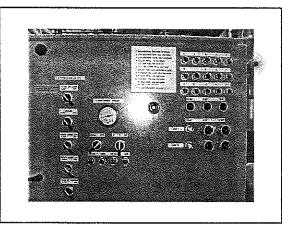
- 3. Additional Work to be Done, Conclusions, Questions
 - A. Dryer Upgrades purchased and on site. 4Q 2004 install.
 - B. Installation of New Gas Flow Meter Installed and evaluating data.

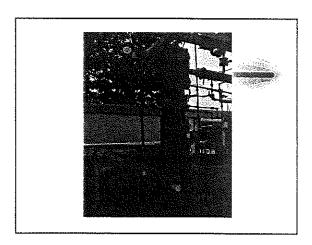
 - Direct Measurement of Emission Rate
 Density Measurement Allows Correction for Non-condensables (e.g., nitrogen) which are now a significant portion of emissions.
 - C. Existing Chiller Controls Upgraded Need to make operator friendly.
 - Methyl Chloride was originally used as a refrigerant. We plan to
 use the recovered liquid at high pressure as the refrigerant to further
 condense the vent stream.
 - Preliminary trials indicate another 50% reduction (roughly a 99% recovery). Cryogenius is Not Needed.
 - 4. Total cost all phases \$500 600 K.



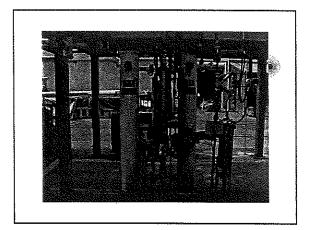




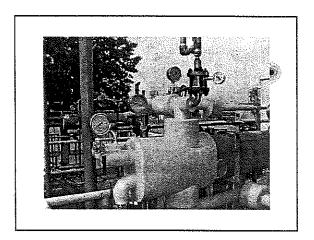




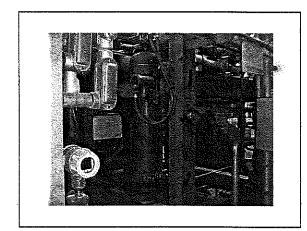


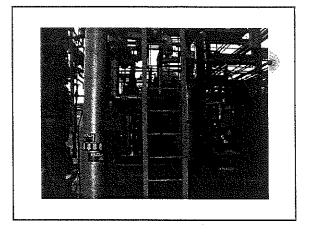


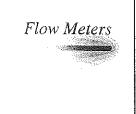
Heat Exchangers

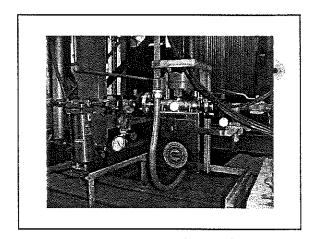












Good Neighbors Award

to be presented to

Rohm and Haas, Cincinnati and Reading fenceline neighbors

Ohio Citizen Action will present our first Good Neighbors Award jointly to Rohm and Haas' Cincinnati plant and Reading fenceline neighbors on Tuesday, December 7, 2004 from 6:30 - 8:30 p.m. at the Civic Garden Center in Cincinnati.

The award will be given to honor the joint efforts of the company and the fenceline community as they forged a new partnership to address historic pollution problems, odors, truck parking and emergency response issues in and around the Rohm and Haas Cincinnati plant.

The award will recognize the improvements Rohm and Haas' Cincinnati plant has made, the commitment of the Reading fenceline neighbors and the overall success of the ongoing partnership. Rohm and Haas' Community Advisory Council, an outgrowth of this partnership, will also be highlighted as a successful model for continued company-community relations.

The award will be one of four community awards presented, but will be the only award recognizing a corporation-community partnership. The three other awards will recognize the efforts of community members in Dayton and Cincinnati.

Please mark your calendars and plan to join us for this awards ceremony. Each CAC member will receive a formal invitation in the mail.



** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. - 7:30 p.m.

Thursday, February 26, 2004

Rohm & Haas Plant, Second Floor Conference Room 2000 West Street (Dinner will be provided)

Topic:
Cognis Corp. Community Advisory Panel
SUMMA canister sample results

Please let me know by Tuesday, February 24, whether you will be attending the meeting. The plant remains under heightened security. You must RSVP for meeting and bring your photo ID. Guests are welcome.

Deb Leonard
CAC Facilitator
772-7903 phone
772-7904 fax
Deb.Leonard@etc-online.com



January 29, 2004 Meeting Minutes

Members Present

Suzie Bateman
Bruce Beiser
Rachel Belz
Bud Elmlinger
Bill Ford
Cheyenne Gill
Rick Gordon
Chief Kevin Kaiser
Joann Krimm
Curt Lambert
Dave Lehrter
Jim Pfennig
Earl Schmidt
Tami Todd

Visitors Present

Bob Bemmes, Jr.

Facilitator

Deb Leonard

The meeting was held in the second floor conference room at the Rohm and Haas plant. Deb Leonard welcomed everyone and reviewed the agenda. Dinner followed.

Plant Update (Bruce Beiser)

Safety

- No OSHA recordable injuries since last meeting. For 2003, the plant had 1 recordable incident, and the lab had 1 recordable incident.
- There was one first aid injury to a chemical operator for a cumulative trauma disorder to the elbow (soreness) from repetitive motions.

Environment

Sewer

• There was one wastewater permit exceedance, but no reportable releases. Rohm and Haas had a low pH excursion on December 18 during plant shutdown. Plant sewers received boiler blowdown with a pH of 12; the pH control system recognized it, but overcorrected on the amount of acid needed to neutralize it during a low-flow period. The plant is working on adjusting the pH control system to handle low-flow periods.

Air

• There were no reportable air releases or permit exceedances to report.

• The plant experienced a small release of methyl chloride (~1 lb) on January 27 while clearing a reactor for maintenance.

RCRA Site Investigation

• There has been no activity on the RCRA site investigation. The plant is waiting for warmer weather to conduct additional groundwater sampling and perform a trench excavation.

Odor Complaints

• On January 3, plant employees logged an odor complaint against Pristine.

• The plant received two odor complaints from neighbors on the evening of January 25. Fenceline neighbors also took a sample of the odor with a SUMMA canister. Hamilton County officials stated that meterological conditions that evening were extremely poor. Plant operations were normal, but the "weather inversion" severely inhibited normal dispersion.

Odor Reduction Project

• Project funds have been approved, and work is underway on the Building 3/3A complex odor project. This \$450,000 project involves segregating relief devices and vents, installation of ventilation hoods and the upgrade of general building ventilation with new fans and exhaust registers. All these systems will be tied into new ductwork, which will exhaust through a 40-foot stack on the roof of the building. Bruce passed around the Rohm and Haas employee newsletter, which has a picture of the work in progress. The 40-foot stack is being fabricated off site at the contractor's facility. Estimated completion date is end of spring 2004.

Methyl Chloride Emission Reduction Project

• The capital funds for Phase 1 of this project have been approved.

• Control meters will be installed next week. The gas dryers are not in yet.

• Ingersoll-Rand will do an overhaul on compressors later this year.

• As part of this project, in the second half of 2004, the plant reduced its methyl chloride emissions by about 8 tons.

Early Truck Arrivals

• In the past 15 weeks, there has been 1 early truck arrival (December 23). It was a delivery truck.

Plant Security Upgrades

• Work is nearly complete. Weather delayed completion of the employee/visitor gate, so the plant is still using the main entrance.

Plant Community Relations Update

• The plant mailed its Environmental, Health & Safety Update newsletters to the community. The mailing list for this newsletter was expanded.

• The plant prepared holiday gift packages for 64 children at Lockland Headstart.

• The plant sent 32 large care packages to U.S. soldiers in Iraq through Operation Patriot Challenge.

Community Update/Announcements/Questions

Q: When will the compressor change happen on the methyl chloride recovery system?

A: Spring. We're going to refurbish the entire compressor.

Q: Is the odor control project at the Building 3/3A complex on track time-wise?

A: Yes, it should be done by the end of March.

Q: What is included in Phase 1 of the methyl chloride emissions reduction project?

A. Phase 1 is everything except cryogenic chilling. Our target is still to reduce our emissions to below 10 tons. If we don't get there in Phase 1, then we need to put the cooling system in.

Q: What is going on with the MSD violations?

A: They are working with us and will take into consideration that they did not inform us of violations in a timely manner. No final conclusion on fines.

Summary of 2003 Evaluations

Deb Leonard presented the results from the 2003 CAC survey. Please see attached summary and tallied results.

The highlights of this discussion are presented below:

- The CAC is split on the issue of whether it has enough members and the right mix of members. Members spent some time discussing who they'd like to see on the CAC. The following ideas were presented:
 - George Hagin, owner of The Lighthouse: Bruce needs to make personal contact
 - —Reading school representatives (i.e., Tim Ackerman of Hilltop Elementary).
 - South side of Evendale: perhaps send invite letters to residents
 - Parents of local school children
 - Student from Mt. Notre Dame
 - Environmental Club member(s)
 - Ask fenceline neighbors to rotate coming to CAC meetings
 - Brian Canteel of Cincinnati State in Evendale
 - Teacher at Cincinnati State who lives in Reading (Huckey?): ask the mayor
 - Ask each fencline neighbor to ask a neighbor to join
- The CAC is least happy with the duration of the meetings (although it still received a score of 7.3 out of 10). The group agreed to meet from 6-7:30 p.m. instead of 6-8 p.m. Members will eat from 6-6:30 p.m. while Bruce gives his plant update. Presentations will begin at 6:30 p.m.
- The CAC also discussed dispute resolution (which received a score of 7.4 out of 10), but there were no recommendations on for improvement. One member expressed concern about being the only fenceline neighbor to call in odor complaints. Some of the other members said they smell the odors, but don't take the time to call.
- Emergency response notification and odor reduction are still the plant issues with the most room for improvement.

Planning for 2004

The group discussed topics/issues they would like to address in 2004. The tentative schedule is as follows:

- Emergency response notification (Mark Scott of NICS) February
- RCRA site investigation (Mark Hemingway of Geomatrix) March
- Odor control project at Building 3/3A complex April

- Plant tour (will incorporate site security changes) May or another warm month
- Toxic Release Inventory June
- Cognis CAP August
- B&B Riverboat trip September
- Methyl chloride emissions reduction project October
- TBD November (actually first week of December)

Because the fourth Thursday in November is Thanksgiving, the CAC agreed to meet on Thursday, December 2, 2004 for our last meeting of the year.

Other Announcements

The Reading Fire Department is planning a Shelter In Place drill on January 16 at Central Elementary and a table-top drill at Reading High School on January 23. The fire department also attended a terrorism response seminar on January 20 funded by the State of Ohio.

A toxicologist from Rohm and Haas corporate offices conducted a "product stewardship" review at the plant today.

Relay For Life is scheduled for June 11-12, 2004 at Veteran Stadium. The CAC needs to discuss its participation at the next meeting.

NEXT MEETING: 6-7:30 p.m., Thursday, February 26

The meeting adjourned at 8:00 p.m.



** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. - 8 p.m.

Thursday, January 29, 2004

Rohm & Haas Plant, Second Floor Conference Room 2000 West Street (Dinner will be provided)

> Topic: 2003 CAC Evaluation Results & Planning for 2004

Please let me know by Tuesday, January 27, whether you will be attending the meeting. The plant remains under heightened security. You must RSVP for meeting and bring your photo ID. Guests are welcome.

Deb Leonard
CAC Facilitator
772-7903 phone
772-7904 fax
Deb.Leonard@etc-online.com



November 13, 2003 Meeting Minutes

Members Present

Suzie Bateman
Bruce Beiser
Bill Ford
Cheyenne Gill
Rick Gordon
Chief Kevin Kaiser
Curt Lambert
Barb Stall
Margie Stall

Facilitator

Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and reviewed the agenda. Dinner followed.

Plant Update (Bruce Beiser)

Safety

- No OSHA recordable injuries since last meeting.
- There was one first aid injury to a chemical operator for a first-degree thermal burn to his forearm.

Environment

Sewer

- There were no wastewater permit exceedances or reportable spills.
- At the last meeting, Bruce reported that the plant had requested a formal hearing regarding the last two Notices of Violation received from MSD in August and September, which were based on sampling from Feb/early March. The plant had also received a penalty notice from MSD for \$14,700, but is contesting it due to MSD's delay in reporting, analysis and investigation.

Since then, the plant has had an informal meeting with MSD to communicate its concerns with the violations. (i.e., MSD regulations state they must report violations within 90 days of occurrence, but they didn't notify Rohm and Haas until 145 days later.) MSD acknowledged the plant's concerns and is taking them into consideration for further action.

• There were no air releases or permit exceedances to report.

RCRA Site Investigation

A meeting was held on site with the U.S. EPA and its contractor, Ohio EPA, U.S. Geologic Service, and Geomatrix, the plant's contractor. All parties toured areas of concern and discussed the issues outstanding. The plant received a better idea of the U.S. EPA's expectations. Progress was made in moving the revised work plan forward. The plant will install 24 groundwater monitoring wells near the truck unloading area starting in February.

Odor Complaints

- The plant received one odor complaint (mercaptan) since the last meeting. The complaint was called in on October 23 at 9:00 p.m. by the Reading Fire Department, who received the complaint from a Rohm and Haas guard.
- The plant continues to use biological treatment on its odor control scrubber.
- The plant is looking at another technology using reactive fragrant oils for sewer odor.

Odor Reduction Project

• Project funds have been approved, and purchase orders for the blowers and construction have been issued. Estimated completion date is end of March 2004.

Methyl Chloride Emission Reduction Project

- Request for capital funds will be submitted this month. This was supposed to be done last month, but there was a delay due to Ingersoll-Rand providing information on the compressor upgrade.
- Detailed design continues on the gas driers, emission control valves, control loop logic, and mass flow meters.
- Since this project started nine months ago, the plant has reduced its methyl chloride emissions by 13 tons compared to the same nine months in 2002. The year to date total for 2003 is 27 tons. The plant is pleased to see this much progress already considering the project isn't complete yet.

Early Truck Arrivals

• There were no early trucks in the past 4 weeks.

Plant Security Upgrades

- Work is underway and visibly obvious, especially for the new road and gate for the employee entrance.
- The permanent guard shack outside the plant gate has been built.
- Poles, lights and cameras are being installed.
- All work is scheduled for completion by the end of December.

Plant Community Relations Update

- The plant donated a "Decontamination Shower Unit" to the Reading Fire Dept in appreciation for their assistance with its emergency preparedness training and planning.
- The plant sponsored 3 teachers to the Teachers In Education Conference at Miami University. They were:
 - Bonnie Sirk, Reading Jr/Sr High School

- Robert Hayes, Hilltop Elementary
- Marsha Wilderspin , Central Elementary
- The plant held its annual Veteran's Day celebration to honor employees who served in the armed forces. One of the plant's chemical operators is working with another agency in town in an effort to send 1,000 care packages by Christmas to U.S. soldiers presently serving in Iraq.

Community Update/Announcements/Questions

- The plant received a noise complaint from the community. The plant investigated it and determined the noise was coming from a piece of equipment with a loud exhaust fan. Corrective action was taken by building a muffler on the equipment.
- 60 Minutes will be broadcasting a segment on security at chemical facilities on Sunday, November 16 at 7 p.m.
- Chief Kaiser said that Central School has almost completed its Shelter In Place plan. On December 4 at 3 p.m., several Reading firefighters and members of Reading's Junior/Senior High School Environmental Club will be getting together to assemble the Shelter in Place kits for that school, which will fully complete their plan. The Fire Department will work with the high school on their plan next. Sts. Peter and Paul recently had a drill for their school's plan.
- Q: Have you ever had a noise complaint before?
- A: Yes. We had one this past summer.
- Q: How many Shelter In Place buckets will you be putting together for Reading Central?
- A: We'll need 10.

Security Regulations Presentation (Bruce Beiser)

Bruce used his laptop computer to demonstrate the plant's computer-based-training module for plant security regulations and new Department of Transportation regulations. Because of the videos included in the module and the computerized exercise itself, the plant is unable to print off a copy for inclusion in the meeting minutes. (If anyone would like to see the security regulation/training program, please call Bethany and a special meeting can be arranged.)

Security, as defined in the presentation, includes physical plant security, transportation, and information technology. Below is a brief outline of Bruce's presentation.

The computer training objectives:

- Why security is necessary
- Rohm and Haas' security plan as a company
- The Cincinnati plant's security plan
- New Department of Transportation security regulations

Part 1:

- Awareness of security issues
 - There are 800,000 hazardous material shipments in the U.S. each day
 - Hazardous materials are most vulnerable when in transportation

Part 2:

- Security improvements
 - Background checks

- Employee ID cards
- Seals and locks on tankers and rail cars
- Restricted access to hazmat areas
- Tamper-proof packaging
- Pre-notification and confirmation of shipments
- Inspection of new shipments
- Written site security plan and updates that satisfy the U.S. Dept. of Transportation, U.S. Coast Guard, U.S. Customs and American Chemistry Council

Part 3:

- Response to security threats
 - 4 different security levels and related policies and procedures

Part 4:

• Role of the employee

Part 5:

• Role of distribution providers (mainly a corporate function)

Preparation of 2003 CAC Evaluation

Bethany distributed copies of the 2002 CAC evaluation for member's to review and decide if they wanted to add any new questions to the 2003 evaluation. Everyone agreed that if we updated the topics covered in 2003 and the number of members, the evaluation is still measuring the right criteria. Bethany will email the evaluation to members not present at tonight's meeting to give them an opportunity to make suggestions or changes. Bethany encouraged everyone to complete the evaluations, which will be mailed out after Thanksgiving.

REMEMBER: There is no December meeting.

The meeting adjourned at 8:00 p.m.



** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. – 8 p.m.

Thursday, November 13, 2003

Rohm & Haas Plant, Second Floor Conference Room 2000 West Street (Dinner will be provided)

Topic:
Preparation of 2003 CAC Evaluation &
New Department of Transportation Security Regulations

Please let me know by Tuesday, November 11, whether you will be attending the meeting. The plant remains under heightened security. You must RSVP for meeting and bring your photo ID. Guests are welcome.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany.dale@etc-online.com



** MEETING NOTICE **

The next Rohm & Haas CAC meeting will be held:

6 p.m. – 8 p.m.

Thursday, October 9, 2003

Rohm & Haas Plant, Second Floor Conference Room 2000 West Street (Dinner will be provided)

In-depth update about the plant's Odor Reduction Project

Please let me know by Tuesday, October 7, whether you will be attending the meeting. The plant remains under heightened security. You must RSVP for meeting and bring your photo ID. Feel free to bring a guest.

Bethany Dale CAC Facilitator 772-7903 phone 772-7904 fax bethany.dale@etc-online.com



Community Advisory Council

AGENDA September 11, 2003 7:00 p.m. — 9:30 p.m.

7:00	Sign-In and Ship Sails	
7:10	Introductions and Dinner	
7:40	Plant Update	Bruce Beiser
	Community Issues Update	
	Announcements	
8:00	Greene Family History in the	
	Ohio River Steamboats Industry	Jane Greene
8:45	Enjoy the Cruise	

The next CAC meeting will be Thursday, October 9. Scheduled topic is the plant's Odor Reduction Project update.



Community Advisory Council

August 14, 2003 Meeting Minutes

Members Present

Suzie Bateman
Bruce Beiser
Rachael Belz
Bill Ford
Cheyenne Gill
Jon Hopkins
Chief Kevin Kaiser
Sabrina Smith
Barb Stall
Margie Stall

Visitors/Guests Present

Dan Bateman CJ Bateman Jeanne Belanger Nancy Beiser Charlotte Burke Joani Ford Rick and Barb Gordon Jane Greene (Speaker) Lauree Kaiser Sister Joan Krimm Flo Edelmann Dan and Susie Milz Jennifer O'Donnell Sandy Ritz Diane Roland Diane Skillman

Facilitator Bethany Dale

B&B Riverboat Dinner Cruise Covington, KY

The meeting was held in a private room on the second floor of the River Queen Riverboat. The boat left the dock at 7:00 p.m. Members and visitors convened inside the meeting room at 7:20 p.m. for a buffet dinner and the meeting.

Plant Update for (Bruce Beiser)

Safety

• The plant has not had an OSHA recordable since July. There was one first-aid response when a mechanic got hit in the face by a piece of equipment. His safety glasses were knocked off and he bruised his nose and got a black eye.

Environment

Sewer

• There were no wastewater permit exceedances or reportable spills.

• The plant received a Notice of Violation on 9/02/03 from the Metropolitan Sewer District (MSD). It was for two chloroform permit exceedances that were noticed during sampling done on the west sewer between 2/28 and 3/01. The plant is attempting to investigate the 6-month old event.

Q: This is the second month in a row that MSD has been so delayed in issuing violations. How

common has this lag-time been on MSD's part?

A: It has never been a problem before. It is frustrating because it is hard to investigate incidents that happened more than six months ago. Once the notice has been issued, we only have two weeks to respond to the violation. The staff at MSD haven't been helpful when we request more information or inquire why it takes so long to issue a violation.

Air

• There were no air releases or permit exceedances to report.

RCRA Site Investigation

• The plant submitted a new work plan to the U.S. EPA in May 2003 and is still waiting on a response back from the agency.

Odor Complaints

• The plant received five odor complaints (rotten egg or mercaptan) since the last meeting, all between 8/18/03 – 8/23/03.

8/18

1 complaint

8/19

2 complaints

8/23 2 complaints

- The plant continues to use biological treatment on its odor control scrubber.
- The number of odor complaints is half of what were received this time last year.

Odor Reduction Project

- The design of the odor reduction project is in its final stage. A lot of work will be happening in September and October.
- The high-velocity discharge fan and stack should be in place by spring 2004. This will disperse the odors higher in the air.

Methyl Chloride Emission Reduction Project

• The new compressor seals continue to show improvement in recovery efficiency. Right now the average efficiency is 93%, up from the 87% before the new seals were added. If the efficiency rate stays at 93%, it would reduce methyl chloride emissions by 20 tons/year. The target is to get this system to recover 98% of methyl chloride emissions and get below 10 tons/year.

• Engineering work continues on the project.

Early Truck Arrivals

• Bruce happily reported that there have not been any early trucks in the past 5 weeks. The plant received one complaint about a truck going down Bernard St.

Plant Community Relations Update

• The plant made a donation to the "Getting To Know You Picnic." This community event will take place September 28 at Koenig Park.

• The plant made a donation to the Taste of Reading/Reading Crossroads Celebration.

• The plant is recruiting volunteers to help the Mill Creek Restoration Project clear out hiking trails at Caldwell Nature Preserve in Carthage. The event will be September 27. If any CAC members are interested in helping out, call Kim Brough at 733-2131.

The Greene Family History in the Ohio River Steamboat Industry (Jane Greene) Bethany introduced the guest speaker, Jane Greene. Jane's family owned Greene Line Steamers. She grew up on many of her family's steamboats – the most famous of which were the Gordon C. Greene and the Delta Queen. She spoke about her experiences and shared many stories about the days she spent on her family's riverboats.

Here is some history about Greene Line Steamers and the Delta Queen.

- Greene Line Steamers was founded in 1890 by Jane's grandfather, Gordon C. Greene.
- The company owned and operated 28 river steamboats at various times throughout its history.
- Jane's father bought the Delta Queen in 1946 for \$46,000. The family sold the boat in 1970 for \$1 million. Today, the Delta Queen is worth \$56 million.
- The Delta Queen was purchased in California and had to be brought via tugboat through the Pacific Ocean, Gulf of Mexico, up the Panama Canal, up the Mississippi River to New Orleans and finally to the Ohio River. Once in Cincinnati, it was taken to Pittsburgh to be remodeled.
- Jane's father died aboard the Delta Queen four years after owning it. He left Green Line Steamers to Jane's mother.
- Jane's grandmother, Captain Mary B. Greene, was the first female steamboat captain in America. There is a statue of her on the river. She is alleged to be haunting the Delta Queen today! The TV show, *Unsolved Mysteries*, has aired several episodes about Captain Mary's ghost on the Delta Queen. Captain Mary died in 1949.
- Some famous Delta Queen passengers include Van Johnson, Loretta Young, Princess Margaret, former President and Mrs. Carter, state politicians and Lady Byrd Johnson.
- Events aboard the Delta Queen include Bingo, passenger contests, card games, shore excursions, crafts, stories of river lore and plenty of time for reading and relaxing.

Bruce thanked Jane for presenting and everyone for coming to the meeting. The meeting adjourned at 9:00 p.m. and everyone went outside to enjoy the remainder of the cruise. The boat docked at 9:30 p.m.

Rohm and Haas CAC Meeting August 14, 2003

M. Curt Lambert EHS Engineer

Reading Plant

Section 313 –this section requires reporting of the environmental releases and off-site transfers of more than 575 different chemicals.

Of the 575, we are required to report on 7, based on exceeding certain thresholds.

For these 7 chemicals, we report

- all air releases
- the amount that goes to the sewer
- off site transfers (% in the waste streams)
- the quantity of a chemical treated by control devices prior to release.

What is the reporting threshold?

TRI chemicals are reportable if more than:

25,000 lbs of the chemical was manufactured or processed OR

10,000 lbs of the chemical was used but not in manufacturing or processing. These are usually chemicals that do not leave the facility as part of the facility's final product (e.g., refrigerant in chillers, hot oil to heat fluids)

How did we calculate the amount that we reported?

The amount is estimated by calculating the releases and off-site transfers by one of the four basic estimation approaches:

- Direct measurement
- Mass balance
- Emission factor

Aqueous Ammonia is used to make tin stabilizers, and anhydrous ammonia is used to make phosphoniums. Almost all of the ammonia in both processes react to form a salt. Discharges from the stabilizer process contains some dissolved ammonia, and discharges from the phosphonium process contains some unreacted anhydrous ammonia. The ammonia concentration in the wastewater is lower in concentration than that used for household purposes.

Water – ammonium chloride salt and ammonia discharged from the process goes to the sewer treatment plant of the MSD under the site's POTW permit (210,989 lbs in 2002).

Air – During the processing, only a small quantity of ammonia is released to the air from the process vents. (1,448 lbs in 2002).

Lead is present in trace amounts in our tin ingots.

Air – Less than 0.2 gram of lead was emitted to the air in 2002. Lead emissions to the air are a result of burning natural gas or No. 2 fuel oil.

Water – About 195 lbs of lead were sent to MSD in 2002. Virtually all of this amount is simply from the lead in the tin ingots.

Solid Waste – About 50 pounds of lead were disposed as solid waste in 2002. The lead is from the same source as for the water.

Chlorine is a gas used in a closed system as a raw material.

Water - none

Air - 4 lbs were released to the air in 2002. The emissions are in the form of fugitives from sources such as valves, flanges, and pipe connections. The emissions are estimated based on results from our quarterly leak detection program. We use this program to locate and repair these infrequent emissions.

Chloroethane is used in the phosphonium process as a raw material.

Water - none

Air - 563 lbs were released to the air in 2002.

Methyl chloride (MeCl, or chloromethane) is used to make tin stabilizers. During processing, some of the MeCl is released to the air under two state permits (P017 and P019) and one federal permit (Title V). The permit limits are 55 tons per year and 70% control efficiency (although we routinely operate at 85-90%). We also operate under production limits and short-term emission limits.

Water – 18 lbs in wastewater.

Air - 46.5 tons were released to the air in 2002.

Glycol ethers are used in asphalt additives and are present in industrial soap and cleaners (e.g., Windex). Glycol ether usage may result in air and water emissions. Glycol ethers undergo biological treatment at the MSD.

Water -2,452 lbs in wastewater from industrial soap usage.

Air - 2 lbs emitted to the air from the manufacture of asphalt additives.

Methanol is used to hold products in solution. It is commonly used as the solvent in automobile windshield-wiper fluid.

Water - none.

Air - 53 lbs were released to the air in 2002.

CHEMICAL	CY2001 PROCESSED	CY2002 PROCESSED	PERCENT CHANGE	CY2001 EMITTED	CY 2002 EMITTED	PERGENT CHANGE
Ammonia	1,680,684	2,122,567	+ 26.3%	167,556	212,437	+ 26.8%
Chlorine	1,611,176	1,970,724	+ 22.3%	1	1	0%
Ethyl chloride	28,955	40,453	+ 39.7%	3,687	563	- 85%
Methanol	58,631	78,945	+ 34.6%	4,572	53	- 98.8%
Methyl chloride	4,351,770	4,942,164	+ 13.6%	71,601	93,033	+ 30.0%
Lead	419	504	+ 20.3%	344	244	- 29.1%
Certain glycol ethers	81,453	367,432	+ 351.1%	2,938	2,454	- 16.5%

CHLORINE: Virtually the same emissions at higher production rates are due to our ongoing "Leak Detection and Repair" program. The 1 pound emitted in CY2002 does not include an accidental release of about 3 pounds.

ETHYL CHLORIDE: Lower emissions at higher production rates are due to a secondary chemical reaction in the phosphoniums process, which converts excess ethyl chloride to a salt.

METHANOL: Lower emissions at higher production rates are due to the elimination of a methanol-generating process. **METHYL CHLORIDE:** The increase is due to lower control efficiency and higher production. CY2001 control efficiency averaged 87.8%, while CY2002 averaged 86.3%.

CERTAIN GLYCOL ETHERS: Lower emissions at higher production rates are due to more sophisticated air emission techniques.

FRIENDLY COMPETITION NEVER HURT ANYONE

The LaPorte citizen advisory council has found that sharing performance data among its member companies has helped facilities continuously improve their processes.

HATINGS MINE

celebration of Responsible Care's 15th anniversary would not be complete without an article recognizing the work of community advisory panels (CAPs). An outcome of the Community Awareness and Emergency Response Code, CAPs have served as a conduit between plant facilities and the communities in which they operate. Working together, plant facilities and their communities have been able to achieve the collective objective of improved health, safety and environmental quality.

I was fortunate to spend some time with one of the largest, longest running CAPs in the country, the LaPorte citizen advisory council (CAC). The LaPorte CAC has 36 participating companies with sites ranging in production from 29,000 to 2.5 million total man-hours. It has some of the largest chemical manufacturers and some of the smallest – all

working together through the CAC to keep the community informed and educated about its industrial neighbors.

FRIENDLY COMPETITION

With so many facilities involved, the CAC has a built-in incentive for companies to be even more open, responsible and committed to continuously improving – peer pressure. Nobody wants to be at the bottom of the list when the CAC reviews the federal and state safety and environmental regulatory reports for each facility. The CAC has gathered and analyzed performance measures even before they became part of the revised Responsible Care. The LaPorte facilities have valued obtaining benchmark information from one another regarding safety, health and environmental performance. Over time, presenting and

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environmental performance. Over time, presenting and reviewing this information in a group setting have allowed the group to develop a positive environment in which representatives from each facility feel comfortable sharing their good, and perhaps not so good information, to the community. They know that along with the sometimes very pointed questions they receive from the citizens, they also hear about best practices from the other facilities that may help them to improve their performance.

At the meeting I attended, the CAC reviewed its "Annual Safety Report for Calendar Year 2002," which listed each facility's recordable injuries and illnesses' rate for employees and contractors as reported to the Occupational Safety and Health Administration (OSHA). The month before, the CAC invited OSHA's area director to describe changes in the recordkeeping rules to educate the CAC on how the changes might affect the way plants calculated their safety rates. The annual report was mailed to all CAC citizens prior to the meeting. Charts illustrated the information in a variety of formats: rating the facilities from the lowest to highest recordable rates; showing the companies rates dating back to 1996; weighting the average rates according to total manhours and recordable injuries, then ranking them in order; and breaking down each companies' information by employees and plant contractors. Those with the worst rates were told prior to the meeting to prepare presentations xplaining why their numbers were so high.

At the end of each presentation, citizens were given the opportunity to address the plant manager. Although respectful, they did not hold back in asking for more detailed information as to the cause of the high records and actions taken. But also included in the discussion was what makes a multi-company CAC different from one serving an individual company. Plant managers from other facilities offered insight into how they handled similar situations and referred training programs that proved effective at their sites. It is this accountability to the community, along with sharing of best practices, in a positive environment that has enabled each company to raise the bar of its performance.

FROM EVENTS TO MEANINGFUL MEETINGS

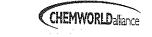
When the CAC was first organized in the early '90s, it focused mostly on large, visible community events. When these became too difficult to sustain, the CAC decided instead to accomplish its goals through more meaningful monthly meetings. With so much to cover, the CAC establishes an annual plan to allocate the appropriate amount of time for upcoming major issues. During the course of the years, the CAC has discussed community concerns that impact everyone, from the Houston port expansion to Y2K to what's uppermost in everyone's mind today – security.

is working harder for you

"My name is Rick Stapleton and I'm responsible for making sure your CHEMCENTRAL orders are at your docks when you expect them - no matter how bad the weather is. I've been doing this for some time and you can count on me to know the best route from our loading facility to your business. My truck displays all required state and federal licensing and precautionary warnings. I also check and sign off on all specs to be sure each compartment carries the exact chemical our customer ordered. It's not an easy job, but I like the responsibility and opportunity to visit our customers' place of business." Chemical distribution is all about dependable delivery, and Rick is one of the best drivers in the business. You can count on him and all the experienced drivers who make our CHEMCENTRAL fleet

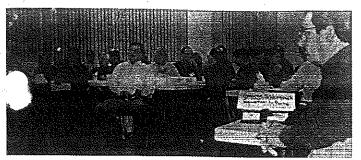
1 like clockwork. Give us a call today. You'll like what you hear.











LaPorte CAC members listen to a plant manager discuss the safety report.

The LaPorte CAC is fortunate to have a long tenure from many of the participants, who have become well educated in environmental and safety issues related to industrial manufacturers. Although the number of participants has remained the same since its inception, the number of participating plants has increased by more than 40 percent – from 25 to 36. The CAC has set a goal for this year to increase membership by 10. For this membership drive, the CAC wants to maintain an overall balance of interest within the group – looking for people who have a commitment to the community: realtors, coaches, ministers and environmental groups. It also wants the CAC to remain geographically balanced for the city and include more citizens who are fence-line neighbors to the manufacturing sites.

MAINTAINING MOMENTUM

From time to time, every large group needs to check if it is still on course with its original purpose and its processes are still working. The LaPorte CAC conducts periodic retreat workshops to help the large group set objectives and improve the dialogue process, if necessary. Flexibility is key to keep the momentum rolling. The CAC citizens are able to shift models and formats to adapt to

new circumstances that come from an industry that is changing constantly due to mergers, acquisitions and downsizing. The group also incorporates time for small group sharing; so every member has the opportunity to participate. Individual companies can also ask for volunteers from the CAC to discuss a specific issue before the monthly meetings.

Another key component to maintaining momentum is the facilitator. The facilitator must be seen as unbiased and must have the respect of all parties involved. The LaPorte CAC is fortunate to have a facilitator in Diane Sheridan, who is well practiced in the art, provides perspective from her work with other CACs and has the respect of both the community and the industry participants. She has built a sense of trust and credibility into the facilitation process, creating an environment in which positive criticism is welcomed and recommendations are expected.

The evening I spent with the LaPorte CAC was reassuring. It was encouraging to see such a dynamic group – both citizens and plant managers – working together for the common good of the community. As CAC member Karen Wheeler-Hall explained to me, "I grew up in this community never knowing what went on behind the fences. Since I've been active in the CAC, I now know more about what is produced and the potential risks. But I also know the processes, procedures and safety measures that the plants take to protect their employees and the community. I'm glad to be a resource to pass that information on to others in the community."

Suzie Squier is editor of Chemistry Business. She can be reached at suzie_squier@americanchemistry.com.

EVALUATING YOUR CAC

Rohm and Haas Experience Shows Effort Worthwhile

The Rohm and Haas chemical manufacturing facility in Cincinnati, Ohio, recently asked its two-year old community advisory council (CAC) to evaluate how things are going. The company wanted to know how the members felt about their efforts and contributions to the CAC, and whether their time was well spent. The company also wanted feedback from the members about what was working well, what wasn't and what needed to be changed. Did the CAC have enough members? The right mix of members? Were efforts being focused on the right subjects or issues? Was progress being made?

CAC facilitator Bethany Dale called other CAC facilitators in Ohio, Kentucky, West Virginia and Pennsylvania, searching for a questionnaire or opinion survey she could offer to her CAC members. She even contacted ACC for help. The search turned up nothing. Surprisingly, no one knew of a CAC that had previously done such a survey, but everyone liked the idea.

Charting new waters, Dale and the CAC went to work creating an evaluation from scratch. The survey included 50 questions that addressed the past and the future. It was mailed to all 24 CAC members in November. Fifteen members comitted the evaluation. The results were tallied and shared with the means at the January CAC meeting.

According to the results, 92 percent of respondents thought their time on the CAC was well spent, and 86 percent said they were comfortable asking questions and

speaking up at the meetings. Most believed that significant progress had been made on all of the issues addressed. One issue in particular, however, needed improvement: The members overwhelmingly thought that the CAC needed to recruit more fence-line neighbors and school representatives. They also felt the CAC needed to improve how it resolved disputes.

According to Dale, one of the most positive things about doing this survey is that it gave the CAC members a private opportunity to provide honest opinions, constructive criticism and suggestions for improvement that they would have been reluctant to voice in face-to-face meetings.

"I am extremely pleased with the feedback we've gotten through this evaluation," said Plant Manager Bruce Beiser. "The results clearly show that as a group we are making progress on our mission to address the health, environmental and safety concerns of the plant and the community. This input will help us focus our efforts in 2003 so that we can step up and concentrate on the issues that matter most to the community."

To obtain a copy of Rohm and Haas' Cincinnati CAC evaluation survey, please contact Bethany Dale, an environmental communications specialist with ETC Inc., at bethany dale@etc-online.com or 513-772-7903.



Community Advisory Council

April 10, 2003 Meeting Minutes

Members Present

Suzie Bateman
Bruce Beiser
Rachael Belz
Carol Bullock-Carpenter
Bill Ford
Cheyenne Gill
Jon Hopkins
Curt Lambert
Jim Pfennig
Barb Stall
Margie Stall

Facilitator Bethany Dale

The meeting was held in the second floor conference room at the Rohm and Haas plant. Bethany Dale welcomed everyone and reviewed the agenda. Dinner followed.

Bethany presented two meeting handouts. The first one was an article about our CAC's 2002 evaluation which published in the American Chemistry Council's *Chemistry Business* magazine. Bethany also passed around a copy of the letter she sent on behalf of the CAC to the U.S. EPA, urging them to award the City of Reading a Brownfields grant. This grant would give Reading money to conduct Phase I and II Environmental Site Investigations at properties near Reading Road and Third Street. (The CAC agreed to submit this letter at the March 13 meeting.)

Plant Update (Bruce Beiser)

Safety

- The plant continues the year without any OSHA recordable injuries. The plant did have one near miss accident this month.
- The plant received a Notice of Violation during an Ohio Department of Health audit due to a paperwork error on the number of radiation sources. The plant corrected the error immediately.

Q: Didn't you report a recordable injury at the last meeting?

A: Yes, I reported a recordable injury incurred by a chemist last month. The plant's research and development department is tracked separately from our manufacturing operations.

Environment

Sewer

• There were no wastewater permit exceedances or reportable spills to report.

Air

• There were no air permit exceedances or releases to report.

RCRA Site Investigation

• There has been no new activity involving the RCRA site investigation. The U.S. EPA is still conducting its evaluation of the report and new testing standards.

Odor Complaints

• Six external odor complaints (rotten egg or mercaptan) have been called in since the 3/13/03 meeting.

3/14 3:55 pm

3/17 5:30 pm and 8:00 pm

3/18 8:55 am, 4:05 pm, and 8:03 pm

• Two plant employees also recorded odor complaints (mercaptan and ammonia).

Odor Reduction Project

• The manway hood design has been provided by Jacobs Engineering. The operability is being assessed.

Q: What does the hood operability assessment entail?

A: The plant must construct one of the hoods on a product tote and hook it up a blower and exhaust system to determine: 1) how well it ventilates that area and 2) how well the plant operator can do his job with the equipment connected.

• The exhaust option has been selected. This involves a 40-foot stack on the building with two blowers that will disperse odors at a higher elevation. It is designed for twice the actual emissions, which should significantly reduce odors.

- Biological treatment (bacteria) is currently being pilot tested in the plant's odor scrubber instead of a hypochlorite treatment. The bacteria works by attacking the mercaptan, which may help reduce plant odors. The plant initially conducted a lab study in which it took samples of wastewater from the sewer and inoculated the bacteria into the samples at varying concentrations to determine what amounts may be needed to reduce odors. 10 employees participated in the study. The lab test was successful so the plant decided to conduct a field test by injecting the bacteria into the odor scrubber. There is a lot that must still be evaluated to find out if this is a viable solution for the scrubber or maybe the wastewater.
- Q: Is that why you can smell odors outside the plant tonight?
- A: Yes. The regular odor scrubber is not active because we are testing the bacteria method. This method shows promise but drastic changes would be necessary to convert the odor control scrubber from a neutralization system to a biological degradation system.
- The plant has brought in an "odor sniffing instrument" called Syranose that is capable of being trained to search for particular odors. The plant wants to see if this equipment is sensitive enough to detect odors, determine where they are coming from and what the concentrations are.

Methyl Chloride Emission Reduction

• This project is moving forward. Corporate engineers from Philadelphia were at the site this week to familiarize themselves with the project and the site.

Early Truck Arrivals

• 13 trucks arrived early since the last meeting (4 weeks ago).

- Five arrived after 6:30 am. Of the remaining 8 early trucks, 6 were either early for the first time or hadn't arrived early since October 2002.
- The plant took action on all 13 occurrences.

Community Relations

• Linda Stichtenoth has resigned from the plant as human resources/community relations manager to pursue a new career in teaching.

Community Update/Announcements

- Suzie Bateman reminded everyone about the American Cancer Society's Relay For Life scheduled for June 13 at Reading Stadium. Everyone is welcome to walk or come out to join in the fun and have some food. Suzie left a sign-up sheet to post in the plant. She is looking for volunteers to walk in one-hour increments. The movie theme for Suzie's team is *The Flintstones*.
- Carol Bullock-Carpenter invited everyone to participate in Reading's Annual Litter Clean Up Day on Saturday, April 26 from 10 am until noon. Anyone interested should meet at Koenig Park. Trash bags and gloves will be given to volunteers. There will be lunch and prizes afterwards. Last year more than 200 people came out to help.
- The Reading Fire Department would like to invite any interested CAC members to help them with their Neighborhood Smoke Detector Blitz on May 10 from 10 am until 1 pm. The firemen and their families go door to door in a Reading neighborhood to talk about fire safety, smoke detectors, carbon monoxide monitors, fall prevention and Shelter In Place. Call Chief Kaiser for more information at 733-5537.

Increasing CAC Membership - Discussion Summary

- After evaluating the 2002 survey results, it was clear that CAC members wish to increase its membership by adding more neighbors and school representatives. The CAC currently has 15-17 active members. We lost two active members, with the plant's community relations position vacant and Debbie Goodhart leaving the City of Reading.
- Members would like to post meeting announcements in the Valley Courier newspaper two weeks before meetings. Due to security, interested citizens will be required to RSVP in order to attend meetings.
- Members also suggested posting meeting announcements on ICRC Community Cable.
- Members would also like to get information out to organizations like the VYO, Reading Chamber of Commerce, school PTO's, school board members, Senior Citizen Centers, other local businesses and churches. The information letters will contain a description of the CAC, its mission, accomplishments, summary of topics addressed, names of members and quotes of support from active members.
- As far as sending letters to neighbors, members would like to target residents on Bernard, West, Reisenberg, Pleasant, Market, Jefferson and Reading Road from Market north to Cooper Road.
- Members also suggested we encourage Marti Sinclair, a Sierra Club volunteer, to come to meetings more often because she has a solid technical background.
- Everyone agreed that having a high school student on the CAC has been a good addition to the group. After Sabrina Smith graduates this year, we will have to look for a

replacement for her. A suggestion was made to invite a student representative from Moeller High School.

• It may be a good idea for Bruce to visit the new residents on Bernard as a follow-up to the CAC information letters that are mailed out.

• Bethany will prepare a mailing list and a draft of the CAC information/invitation letter for members to review.

Shelter In Place Booth Sponsorship – Discussion Summary

- In 2002, the CAC sponsored a booth at the Reading Crossroad's Celebration and the Taste of Reading.
- The Fire Department continues to hand out Shelter In Place materials at various events throughout the year, such as the upcoming event on May 10.
- CAC members would like to have a Shelter In Place booth at the Taste of Reading in September 2003. Members agreed to keep an eye out for other events where a booth or information session on Shelter In Place may be appropriate.

The meeting adjourned at 7:50 p.m.

Field Trips

• Last year, we visited DataChem and saw the processes involved in air sample analysis.

We had lunch at Sharon Woods

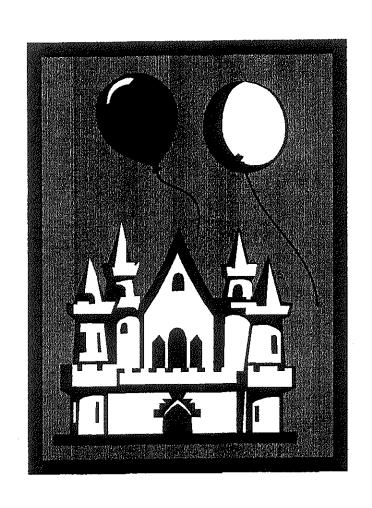
• We ended our day with a bus tour of Rumpke.

Water Movement Day

- October 2002
- Field Trip To The Ohio River
- Learned more about the Environment around us
- Learned about sewer water

- Learned about the water-monitoring fish in the water
- Learned about how the fish stay in existence
- Had lunch at the Serpentine Wall

Trip to Camp Kern



- We took a trip to
 Camp Kern for our
 end-of-the-year field
 trip this year.
- We participated in team-building activities

Other Activities

- The environmental club has taken a hiking trip and a canoe trip in the past
- We try to do one outdoor trip every year
- The club held a lockin during the 2001-2002 school year
- Activities included:
 - cleaning recycling bins
 - painting a classroom
 - making our bulletin board



- Paper Product Recycling
 - office paper, newspaper, & magazines
 - one recycling bin in every classroom
 - bins are also in administrators' and counselors' offices and copy rooms



• How We Recycle Paper

- First we get rooms that have full bins.
- Then we empty the bins into garbage bags.
- Next we take the bags out to the large recycling bin.
- Then we dump the paper, cardboard, and all recyclable items into the bin.



Aluminum Can Recycling — several containers are place

- jamitor empties and cashes in cans for the club several containers are placed in the caleteria for students and staff to use

More Activities

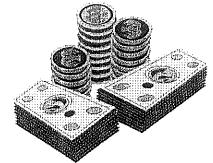
•We have adopted manatees

•We have built an air-sampling bucket, but still have not used it



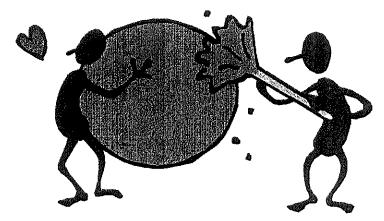
Fundraising

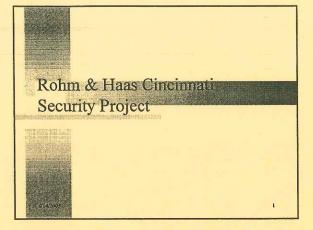
- Flower Sale: for the past few years, we have sold flowers around Mother's Day
- Pizza Sale: we sell pizza during the school lunches once a year
- Cloth Bag Sale: this year we sold cloth bags at Kroger for our annual fundraiser
- Bags are available tonight for only\$5.00



How We Can Work Together... CAC & Environmental Club

- Shelter-in-Place Booth
- CAC Recruiting Booth
- Reading Clean-Up
- Field Trip Chaperones
- Vorhee's Park and Benson Street Clean-Up





Background

- As a result of 9/01; the American
 Chemistry Council (ACC) has developed
 a 7th Code for Responsible Care.
 Includes conducting a Site Vulnerability
 Assessment (Completed 11/02)
 - Implementing Corrective Actions (due 12/03)
 Third Party audit of corrective actions (due 3/04).

Site Vulnerability Assessment

- 37 Action Items
 - 23 completed already
 - 5 actions require capital (Security Project)
 - 9 remaining items

Project Goals

- Reduce vulnerability of Cincinnati site to terrorist threats through...
 - Deterrence
 - Detection
 - And Delay
- Comply with ACC guidelines/schedule

Scope of Project

- Installation of a surveillance system that will effectively monitor the perimeter of the site and provide deterrence and early detection of unusual activities near the fence line
- Separation of truck and employee/visitor entrances
- Improvement of perimeter lighting.
- Installation of access control.
- And fence modifications to increase distance of fence from MeCl/Cl₂ railcar as well as to increase the height of the fence in certain locations.

Issues for Community

- New Entrance reduces size of ball field closest to plant (T-ball size).
- Cameras will be programmed to not view into private residence areas (including pool area).
- Lights along fence line near homes and walking path will be programmed to turn on with fence detection.